

Bath and North East Somerset Council

Local Plan 2022 – 2042

Options Document



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Tell us what you think

We want to hear views from as many people as possible and we want it to be easy for you to tell us what you think.

How to comment

Please comment online via our website:

<https://beta.bathnes.gov.uk/local-plan>

If you have difficulty commenting online, or you need information in a different format, please let us know and we will be happy to assist.

Please note that we will not be accepting comments via email. All online comments should be submitted via our website.

All comments must be received by 8th April 2024.

1 Introduction

What is a Local Plan and why do we prepare it?

- 1.1 The Local Plan will establish a strategy and framework for how places in Bath and North East Somerset will change and grow over the next 15-20 years. It sets out planning policies that will shape any development that requires planning permission. The plan identifies the need for new homes and jobs, and the services and infrastructure to support them, and guides where this development should happen and what form it will take. It is about ensuring that we maintain and create sustainable, vibrant and healthy places and communities.
- 1.2 Change and development will happen whether we prepare a Local Plan or not. We prepare it in order that we can influence and shape the location and form of future development and to help ensure that it is better supported by the timely provision of necessary infrastructure. Without a Local Plan speculative development will take place, in less sustainable areas, and in an unplanned way. We also prepare a Local Plan in order to protect what is special about Bath and North East Somerset, including its unique, high quality and renowned built and natural environment.
- 1.3 This Local Plan covers the whole of Bath and North East Somerset and will establish the planning framework for the district up to 2042. It will contain a vision, strategy and policies to guide and manage growth and change; and will be the basis for how planning applications for new development are decided. It will also play a crucial role in delivering the Council's corporate priorities, including improving people's lives, tackling the climate and ecological emergencies, and preparing for the future in terms of the economy, responding to housing need and addressing inequalities. The Local Plan will be reviewed around every 5 years and updated where necessary.

How do we prepare the Local Plan?

- 1.4 We will prepare the Local Plan through consulting and involving communities and a range of other stakeholders – **giving people a bigger say** in how the area will change. Preparation of the Local Plan is governed by legislation and will go through a series of stages which are summarised in the diagram below. The diagram also sets out the anticipated timetable for each stage of preparation of the Bath and North East Somerset Local Plan.

Stage 1: Launch	October 2022	Launch Document published and consulted on, to commence the preparation of the Local Plan.
Stage 2: Evidence Gathering, Engagement and Options Formulation	October 2022 – January 2024	Extensive gathering and analysis of data, evidence and information on key issues has been carried out. Engagement has been carried out with community representatives and key stakeholders across the district. Policy and site options have been formulated.
Stage 3. Options Document Consultation	February 2024 – March 2024	Consultation on this Options Document.
Stage 4: Preparation of Draft Plan and Targeted Engagement	March 2024 – December 2024	Having taken account of responses received from consultation, and further analysis of evidence, the Council will prepare a Draft Plan. Additional targeted engagement with key stakeholders will also be carried out.
Stage 5: Draft Plan Consultation	January 2025 – February 2025	A Draft Plan will be published, and consultation on this document will be carried out for a period of at least 6 weeks. The local planning authority may make changes to the Draft Plan following the consultation, and may decide to carry out further consultation if any resulting changes are considered to be significant.
Stage 6: Submission and Examination	March 2025	The final Draft Plan will be submitted to the Government along with the supporting evidence base, following which an independent Inspector will be allocated to assess the soundness of the Plan.
Stage 7: Hearings	January 2025	The independent Inspector will hold an Examination into the soundness of the Plan. The Examination hearings will include evidence from anybody who wishes to make a submission on any of the key issues or questions highlighted by the Inspector. The Inspector will consider all of the evidence and representations made through the Draft Local Plan consultation process.

Stage 8: Inspector's Report	June and July 2025	The Inspector will assess whether the Local Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. The Inspector will publish their recommendations in a Report. If the Inspector has not recommended adoption, the Council can adopt the Plan in line with any 'main' modifications as suggested by the Inspector.
Stage 9: Adoption	November 2025	The Council will adopt the Plan at a full Council meeting.

- 1.5 This document sets out options or reasonable alternatives for addressing the identified needs and policy approaches to help deliver healthy and sustainable places. Its purpose is to elicit comment and discussion around these options. The comments received, as well as ongoing engagement with communities and other stakeholders, will be used to help shape the Draft Local Plan. It is the Draft Local Plan that sets out the Council's proposed site allocations and policies to shape and guide change and development that requires planning permission.
- 1.6 The Draft Local Plan is then subject to formal consultation and both the Draft Plan and comments received are submitted for examination by a government appointed Planning Inspector. The Inspector will be examining whether the Local Plan is sound. As defined in national policy the tests of soundness comprise:
- Positively prepared: **comprise a strategy that at least meets identified needs**
 - Justified: **based on proportionate evidence**
 - Effective: **deliverable over the plan period and based on effective joint-working on cross boundary strategic matters**
 - Consistent with national policy: **as set out in the national planning Policy Framework and other government statements**
- 1.7 Once it has been examined and subject to the Inspector's conclusions the Local Plan can then be adopted. Once it is adopted the Local Plan becomes the statutory framework for determining planning applications.

What opportunities are there to be involved?

- 1.8 The Council is committed to giving people a bigger say and we have involved community representatives in preparing the Options document. This Options document is published for consultation over an eight week period, from 12th February to 8th April. We are encouraging all residents and stakeholders to comment on and give your views on the options we have presented, this is a major opportunity to **have your say** and help influence future change. There will be a range of in-person and web-based events to explain and discuss the Options during the consultation period. Please make sure you submit your comments by 8th April.
- 1.9 We will continue to work with communities and other stakeholders in progressing towards a Draft Local Plan, particularly those places where development may be focussed. Once prepared and approved by the Council later in the year, the Draft Local Plan will also be published for consultation for a period of at least six weeks. As such there will be a further opportunity to submit comments on the Draft Local Plan. The comments received and the Draft Local Plan itself are then submitted for examination by a Planning Inspector. Those individuals and organisations that object to the Draft Local Plan will have the opportunity to participate in the examination.

Structure of this Options Document

- 1.10 The Options document basically comprises chapters which set out:
- The issues and challenges facing the area;
 - The overall priorities of the Local Plan (what it is seeking to achieve);
 - The development needs that should be planned for;
 - The approach to a District-wide strategy;
 - Chapters setting out options for growth and change in specific parts of and places in the District; and
 - A chapter setting out options for policies that would apply across the whole of Bath and North East Somerset in determining planning applications.

2 Bath and North East Somerset Issues, Challenges and Spatial Priorities

- 2.1 The Local Plan will set out a strategy and planning policy framework to help guide and shape future development and change, whilst also enabling greater climate and environmental resilience and protecting and enhancing our high quality natural and built environment and key assets. In guiding change the plan will be seeking to address key issues and challenges facing Bath and North East Somerset and its communities.
- 2.2 New development can provide an opportunity to shape and improve places e.g. by providing infrastructure needed by existing communities and creating environments that promote health and well-being. The place we live in can fundamentally influence our health and well-being, and shaping our communities in this way provides an opportunity to influence and establish positive behaviour, healthier lifestyle habits and inclusive communities. Planning for climate and environmentally resilient places will also help to reduce health risks.
- 2.3 The key issues and challenges facing Bath and North East Somerset and its communities are summarised below and alongside the Council's corporate priorities they have shaped the spatial priorities for the Local Plan – that is the outcomes we are seeking to achieve. In the Local Plan Launch Document, published autumn 2022, the proposed central policy aims of the Local Plan were outlined. These have been incorporated into the spatial priorities outlined at the end of this chapter. These spatial priorities will drive the site allocations, policy framework and therefore, what the Local Plan will achieve.

Key issues and challenges facing communities

- 2.4 We have undertaken research and consulted with community representatives and stakeholders to identify the key issues and challenges facing the District and places within it. Some of the key issues, many of which are closely inter-related, are identified below.

Housing Affordability and the Economy

- 2.5 Across Bath and North East Somerset we know that housing affordability is a key issue. Many residents are finding it difficult to access decent housing, either to buy or rent, because prices are so high. Evidence shows that the impact of high house prices is exacerbated by average median workplace wages in Bath and North East Somerset being lower than those nationally. As a result across Bath and North East Somerset the average house price is eleven times average workplace earnings and in Bath it is nineteen. The lack of housing that is affordable for residents and workers affects not only people's quality of life, but also has a direct impact on our economy.

- 2.6 In addition to the lack of affordable housing communities also raise the requirement for smaller dwellings, both for smaller households wanting to access their first home, as well as for older people that are seeking to downsize.
- 2.7 Work underpinning the Economic Strategy shows that Bath and North East Somerset has a resident workforce that is highly skilled, unemployment levels are low and we are home to some nationally leading and significant businesses and economic sectors. However, evidence also shows that our economy is under performing (with growth being below that of the West of England and the UK for longer than the last ten years) and median wage levels are low. The causes of economic underperformance are complex, but in terms of the issues the Local Plan can seek to address these will include a lack of housing that is affordable and an insufficient supply of employment land. These are challenges that need to be addressed to create a prosperous and sustainable economy for the benefit of our residents.

Climate and Ecological Emergencies

- 2.8 Bath and North East Somerset declared a climate emergency in 2019 and is aiming to be carbon neutral by 2030. Four strategic priorities guide action to reduce emissions – decarbonising homes, decarbonising buildings, increasing renewable energy generation, and decarbonising the council’s own operations. Achieving this goal will be challenging, but there are many opportunities for planning to support this journey. It is important that action is taken at all spatial scales, both individually and at a neighbourhood or more strategic scale. From a planning perspective this includes energy use and carbon emissions arising from travel, existing buildings (e.g. retrofitting of energy efficiency measures) and new buildings (operational energy and embodied carbon in its construction). Additionally planning can help facilitate increased regeneration of renewable energy, through free standing installations, as well as on buildings.
- 2.9 Action on climate change must also consider planning for climate resilience. The changing climate will bring an increased likelihood of flooding, overheating, and extreme weather events that are likely to become more frequent. Reducing the impact of these changes on our communities and businesses will be critical, and there are opportunities to achieve this alongside reducing emissions, improving people’s health and wellbeing, and supporting nature recovery.
- 2.10 Bath and North East Somerset declared an ecological emergency in 2020 in recognition of the significant declines in species and habitats recorded globally, nationally, and regionally. The council is aiming to be nature positive by 2030 and has set 3 priorities:
- Increase the extent of land and waterways managed positively for nature across Bath and North East Somerset

- Increase the abundance and distribution of key species across Bath and North East Somerset
 - Enable more people to access and engage with nature
- 2.11 Further information is set out in the council's Ecological Emergency Action Plan. The Nature Positive ambition requires innovation in planning, including use of new decision making tools, new more joined up and integrated planning policy that delivers for people and nature. There are increasing opportunities for local people and business to engage with and benefit from a more robust and resilient natural environment, where natural processes and features are protected, created and enhanced to benefit communities and sustain nature.
- 2.12 The district has outstanding landscape character, including the Cotswolds National Landscape and Mendip Hills National Landscape. The district also supports nationally and internationally important heritage assets including the City of Bath, which is a double inscribed UNESCO World Heritage Site, and many areas of wildlife significance, including internationally important bat sites in and around Bath and at Compton Martin, and the internationally important bird site at Chew Valley Lake. Access to the countryside and the natural environment which can sometimes be challenging is highlighted by residents as being important for quality of life and physical and mental health and well-being.

Health and Well-Being

- 2.13 Bath and North East Somerset remains one of the least deprived local authorities in the country, ranking 269 out of 317 for overall deprivation. However, there are inequalities within the district, communities that experience deprivation (both Twerton West and Whiteway fall within the most deprived 10% nationally), and patterns of rural poverty are growing. Life expectancy is 9 years lower for men and 5 years lower for women in the most deprived areas of Bath and North East Somerset than in the least deprived areas. An estimated 19% of children and young people (equating to 7,167 residents aged 0-15) in Bath and North East Somerset live in relative poverty. With the cost of living set to continue to rise, it's estimated 4,000 people will fall into absolute poverty in 2022-23. This will exacerbate existing needs including fuel poverty (11% of households live in fuel poverty in the district) and food insecurity. Inequalities is a concern that has been raised by communities, including in relation to an ageing population and people living longer with multiple health and social care needs.

- 2.14 Whilst the health of people in Bath and North East Somerset is generally better than the England average, residents still have important health and wellbeing needs that the built and natural environment can play a role in addressing. There are significant levels of obesity amongst both children and adults in Bath and North East Somerset, meaning that whilst obesity is below the national average more adults in the district are overweight than not. Large numbers of both children and adults are not physically active. In relation to cardiovascular and respiratory health, Bath and North East Somerset has high numbers of residents with hypertension and asthma. Residents also self-report higher rates of anxiety and loneliness compared to the England average. In addition, the rate of hospital admissions in those under 18 years for mental health conditions is significantly higher in Bath and North East Somerset than nationally.

Transport and Connectivity

- 2.15 Communities have made it clear that traffic congestion and being able to access attractive walking and cycling opportunities/infrastructure, as well as frequent and reliable public transport are key challenges across much of the District. This is particularly true in the rural areas where improvements are needed to the connectivity of villages to the cities and towns in Bath and North East Somerset and the surrounding area. Further investment across the district is needed in public transport and active travel infrastructure including improvements to existing active travel networks to make them safer and more attractive, thereby encouraging greater use.

Culture and community identity

- 2.16 Cultural activity plays an important role in people's health and well-being, as well as contributing to community identity and vibrant, attractive places in which to live. Across Bath and North East Somerset the cultural offer is varied and this is an issue highlighted by stakeholders that needs to be addressed e.g. through protecting existing cultural and community facilities, seeking to provide new and enhanced facilities where needed and considering the important role of public spaces of different types. Cultural and creative industries also play an important role in our economy and an increased contribution from this sector should be encouraged.
- 2.17 Communities have identified that they value a sense of community identity and belonging, which is important in reducing social isolation and loneliness and creating healthy, vibrant and inclusive communities. The availability of high quality, accessible public spaces and community infrastructure are important in achieving this and are influenced by the planning system. Maintaining community identity and local distinctiveness are challenges that the planning system has an important role in addressing by protecting landscape character, respecting local building styles and materials and setting a framework for the design of public spaces.

B&NES Council Corporate Priorities

- 2.18 We adopted the [B&NES Corporate Strategy](#) in July 2023, which sets out our overarching strategic plan. The corporate strategy sets out that the Council's overriding purpose is 'to improve people's lives'.
- 2.19 In order to define and show how we will deliver the overriding purpose the Council has two core policies, three principles and nine priorities. These are set out in the Corporate Strategy, but can be briefly summarised as follows:
- Two core policies of tackling the climate and nature emergencies and giving people a bigger say
 - Three principles, amplified through commitments as follows:
 - Preparing for the Future – we will work towards a resilient, sustainable economy that is fair, green, creative and connected
 - Delivering for Local Residents - we will continually improve frontline services across our communities, whilst protecting the most vulnerable
 - Focusing on Prevention - we will invest in prevention across all services to tackle inequalities and improve local areas
 - Nine priorities which set how we will improve people's lives. These priorities are not listed here, but many of them are related to what the Local Plan is seeking to achieve as summarised in the diagram below.
- 2.20 The spatial priorities of the Local Plan are shaped by the Council's Corporate Priorities, as well as addressing the key issues and challenges outlined above. It is clear that a transformative approach to plan-making is required to help deliver against these priorities and the council's commitments.

Key B&NES Strategies and Delivery Plans

- 2.21 Alongside the Local Plan there are a range of other key strategies and plans that the Council is preparing which will help deliver our overriding purpose and core priorities. Many of these strategies and plans are relevant and relate to the Local Plan and the Council will ensure alignment, wherever possible, of the Local Plan with these strategies and delivery plans. These comprise:

Strategy / Delivery Plan	Status	Owner
Corporate Strategy	Adopted	B&NES
Climate Emergency Strategy	Adopted	B&NES
Health and Wellbeing Strategy and Implementation Plan	Adopted	Health and wellbeing Board
Economic Strategy	In development	Future Ambition Board
Business and Skills Plan	In development	B&NES
Green Infrastructure Strategy	In development	B&NES
Integrated Care Strategy	Adopted	BSW Together
Children and Young People Plan	Adopted	Health and wellbeing Board
Bath Swindon Wiltshire Implementation Plan	Adopted	BSW Together
Health Improvement Framework	In development	B&NES
School Organisation Plan	Adopted	B&NES
Ecological Emergency Action Plan	Adopted	B&NES
Climate Emergency Action Plan	Adopted	B&NES
Journey to Net Zero Transport Plan	Adopted	B&NES

Housing Delivery Plan	In development	B&NES
Transport Delivery Plan	In development	B&NES
Active Travel Masterplan	In development	B&NES
Tree and Woodland Strategy & Action Plan	In development	B&NES

Doughnut Economics Model

2.22 The Council is looking to use the Doughnut Economics Model in underpinning our approach to improving people's lives and particularly in preparing for the future. We will utilise Doughnut Economics in helping us to ensure we are tackling the climate and ecological emergencies and in moving towards a more resilient, greener and fairer economy. This means doing things differently to how they were done in the past and carefully evaluating our decisions and actions in order that they seek to meet or address our social and economic foundations or needs, without exceeding environmental limits or capacity. This approach is articulated through the Bath and North East Somerset decision-making wheel.

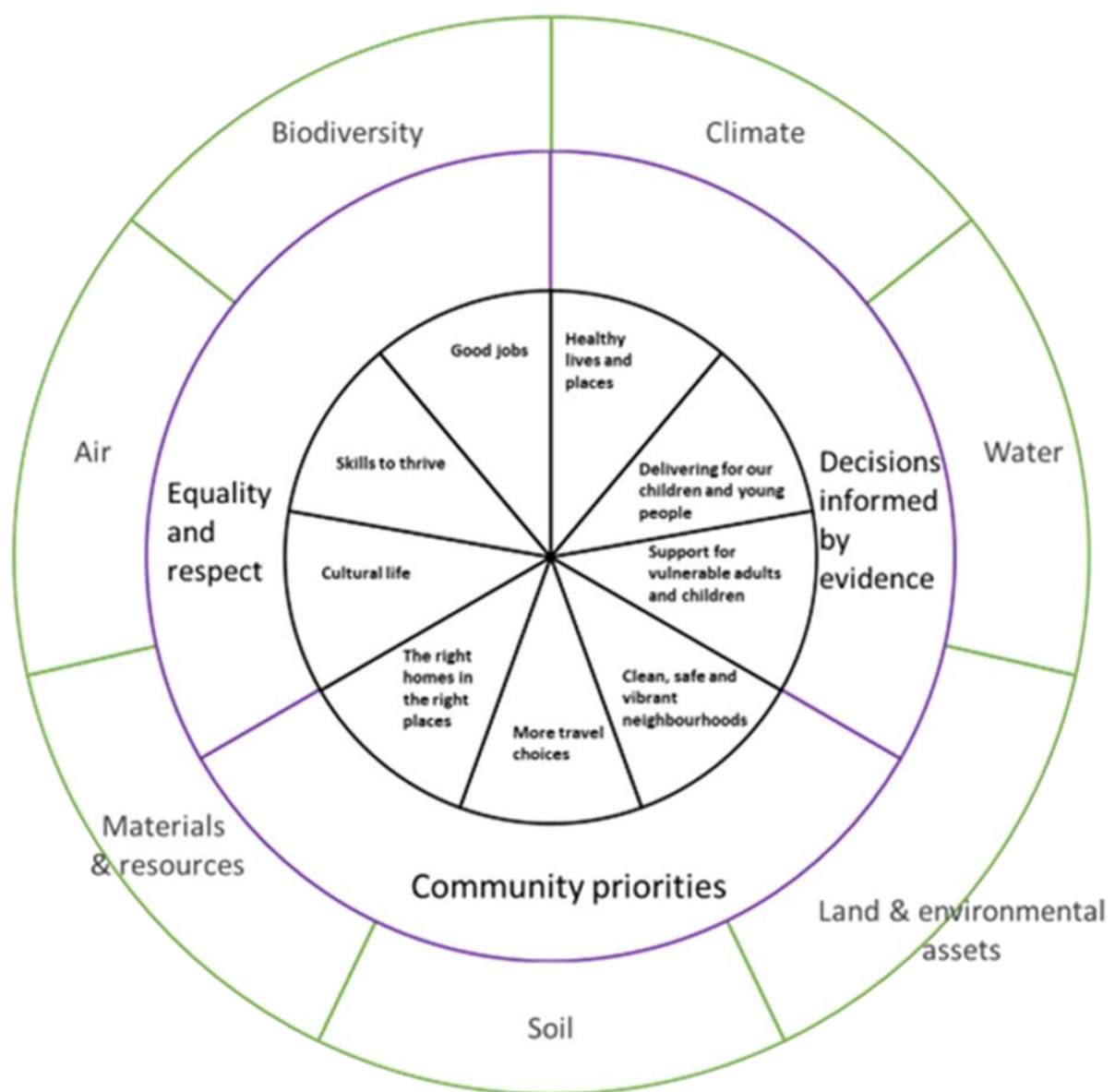


Figure 1: Bath and North East Somerset decision making wheel

2.23 The Doughnut Economics Model and the social foundations and environmental limits set out in the decision-making wheel are closely reflected and incorporated into Sustainability Appraisal of the Local Plan. Local Plans are statutorily required to be subject to Sustainability Appraisal in order that the sustainability effects of the plan can be understood, assessed and demonstrated against a wide range of sustainability objectives, as well as identifying how negative effects can best be mitigated. At this stage of the Local Plan preparation process Sustainability Appraisal is particularly valuable in understanding the sustainability effects of different alternatives or options and therefore, fundamentally informs decision making moving forward to the Draft Local Plan. In addition to undertaking the Sustainability Appraisal we have also undertaken a Climate Impact Assessment of the key spatial options. This tool enables us to understand the comparative impact of different options principally in terms of likely carbon emissions. It will also underpin decisions on the Local Plan. As such it is another vital element of ensuring the Local Plan helps us to tackle the climate and ecological emergencies.

Spatial Priorities for the Local Plan

2.24 The Spatial Priorities for the Local Plan shape and articulate what it is the Local Plan will achieve. As set out above they have been informed by the key issues and challenges facing the area and our communities and are also shaped by the Council's corporate strategy. The Local Plan will seek to help deliver spatially what we aim to achieve through our other key strategies and plans set out above and more widely, centred on improving people's lives. The spatial priorities of the Local Plan are set out below.

Our Local Plan will plan for development in response to local needs to create attractive, healthy and sustainable places in line with the Council's Corporate Strategy.

The Plan will:

- Create a **fairer**, more **prosperous** and **sustainable** economy
- Maximise the delivery of housing that is **affordable**

In doing so, our plans for development must:

- Enable Bath and North East Somerset to become **carbon neutral by 2030** and deliver a climate resilient district
- Protect and enhance nature through facilitating **nature recovery**
- Improve **health and well-being** outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment
- Reduce the need to travel unsustainably and enable **improved connectivity** for all through sustainable modes of transport and facilitating locally available services and facilities
- Respect, conserve and enhance our **heritage assets** and their landscape settings, in particular the World Heritage Site of Bath and National Landscapes
- Align the timely provision of **transport, health, education, social, cultural and green infrastructure** with development

2.25 These spatial priorities are clearly linked back to and will help deliver on the Council’s overriding purpose and the core policies, principles and priorities established in the Corporate Strategy. The relationship between the Local Plan spatial priorities and the Corporate Strategy are illustrated in the diagram below.

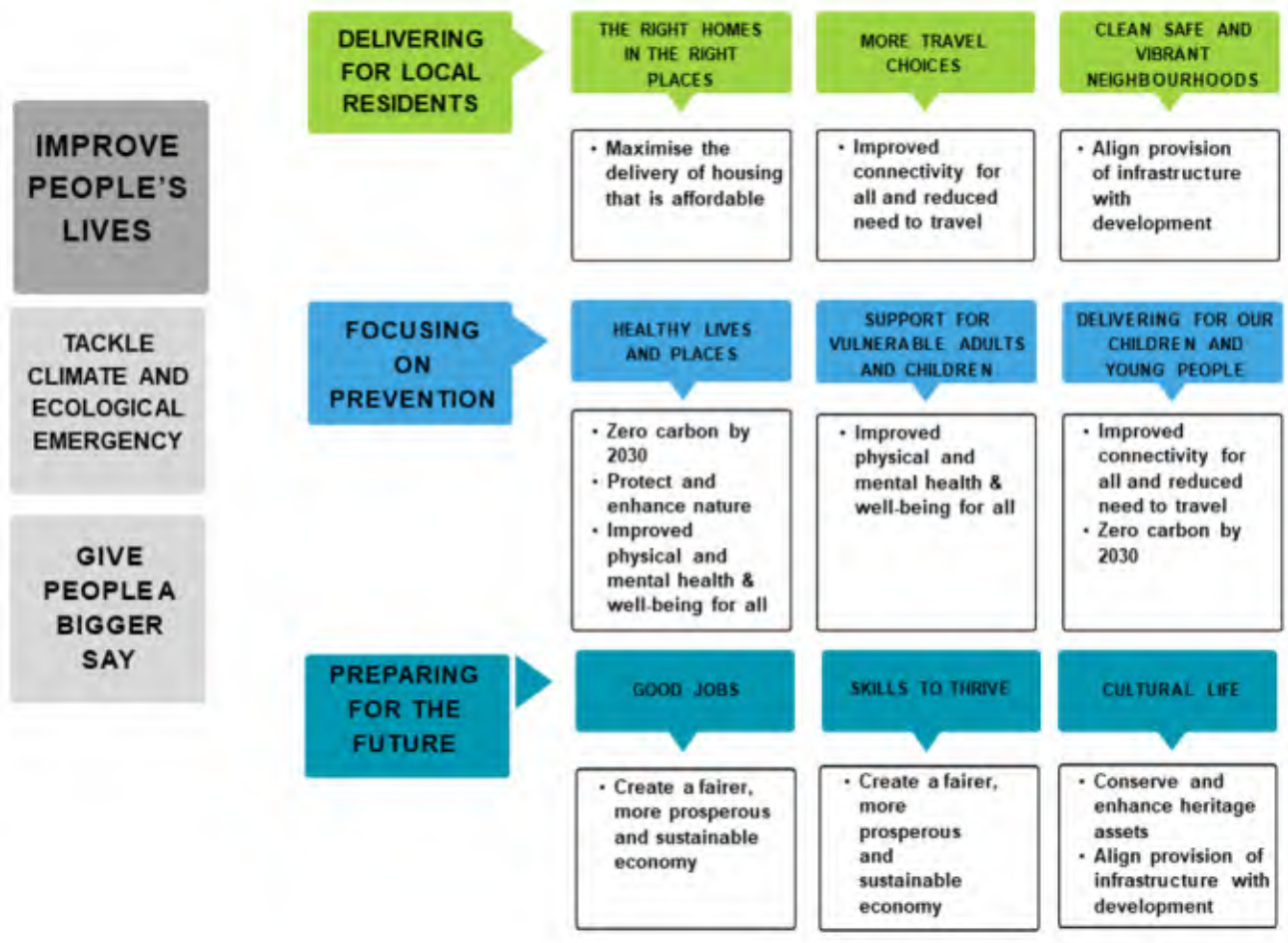


Figure 2 Diagram showing relationship between Local Plan spatial priorities and Corporate Strategy

- 2.26 The spatial priorities underpin and will be delivered through the Local Plan site options and policy approaches set out in the chapters that follow. They are also unpacked in various parts of the Local Plan Options document and in the evidence base, including through Transport Vision and Objectives. The Transport Vision and Objectives set out in greater detail what we are seeking to achieve in respect of our transport policies and projects, that seek to improve connectivity within and between existing places, and align with and support development.
- 2.27 As set out above the overarching priority of the Local Plan will be to plan for development in a way that delivers sustainable and healthy places. What we mean by sustainable and healthy places will need to be set out in the Draft Local Plan. The definition will draw from and reflect the spatial priorities for the Local Plan, and also other strategies including the One Shared Vision, which focuses on delivering places and communities that are fair, green, creative and connected. Through consultation on the options document you can comment on the proposed spatial priorities of the Local Plan and also the definition of sustainable and healthy places.

Q: Do you agree with the scope of the spatial priorities outlined above?

Q: What do you think are the key elements of a sustainable and healthy place?

3 Key Requirements in Bath and North East Somerset

- 3.1 Drawing from the issues and challenges facing Bath and North East Somerset; the spatial priorities of the Local Plan; and a range of evidence, the key requirements or needs that the Local Plan must respond to are set out below. These key needs include:
- a) Forecast job growth in key economic sectors and the associated need for employment space in order to help foster a prosperous, greener and fairer economy
 - b) The need for housing to address existing and projected changes in the population and to respond to the needs of different groups
 - c) Measures to help tackle the climate emergency that can be facilitated through the Local Plan
 - d) The urgent need for and to facilitate nature recovery and enhancement across the district
 - e) The needs of health and well being and the role places can have influencing health outcomes
 - f) Transport requirements that are pivotal in making the district more sustainable and delivering other societal benefits by enabling movement and connectivity for all by public transport and active travel

The above list of key needs is not exhaustive. It is also important to note that whilst the Local Plan will seek to respond to all of these needs, there may be occasions where there is conflict between them. In these circumstances a key role of the Local Plan is to establish a framework for balancing these needs and to prioritise addressing them.

Jobs and Employment

- 3.2 The council has prepared an Economic Strategy which identifies key issues facing the local economy such as lower than average wages, recent economic under performance resulting from, in part, lack of space for businesses to grow and low productivity, as well as the availability of housing that is affordable. It outlines how the council is taking action to change this and drawing on the principles of Doughnut Economics will seek to transform the Bath and North East Somerset economy to one which is more prosperous, greener and fairer. Through the Economic Strategy the council will focus its actions in three broad themes:
- **Infrastructure** which supports a green and connected future
 - **Innovation** that drives a creative economy

- **Opportunity** unlocked for everyone so that we are fair and inclusive

As such the strategy includes a focus on developing Bath and North East Somerset to be a leader in green inclusive growth, upskilling residents and providing them with the opportunity to access and thrive in good work and outlines how the council will work with businesses and enable local organisations to act on new market opportunities.

- 3.3 For the Local Plan and in the context of the Economic Strategy, evidence has been prepared examining trends and forecasts in economic sectors and the space requirements to be addressed through the Local Plan. It notes that the district has experienced relatively weak economic performance over the 20-year historic period compared to both the sub-region and national averages and it is likely that a lack of supply of suitable employment sites and premises has contributed to this position (including industrial, warehousing and offices), It reports of firms unable to locate or expand in the area, and some companies having to relocate outside the Bath and North East Somerset area in order to find suitable accommodation. The response to the evidenced requirement for employment space to accommodate key sectors as outlined below will be developed through the Draft Local Plan. Some of this requirement will be delivered on existing commitments (sites with planning permission or allocated in the adopted Local Plan) that will need to be reviewed Options are also outlined at this stage in terms of protecting existing employment land, intensifying some key areas of employment land and providing new space, primarily as part of mixed-use development. Further work and engagement with the business community will need to be undertaken in preparing the Draft Local Plan to ensure that the proposed employment space supply sufficiently addresses the requirements identified.
- 3.4 Key growth areas for jobs based on the forecasts are in the human health and social work employment sector; accommodation and food services (hotels, restaurants and bars etc); Information & Communication and Professional, Scientific & Technical sectors. The latter sectors in particular are those that can help drive innovation and a more creative economy. In terms of sectors with a significant influence on employment land the evidence suggests there will be some decline in manufacturing and a decline in Transportation & Storage, alongside growth in the sectors outlined.
- 3.5 Analysis undertaken has highlighted the ongoing need to deliver office, some industrial and warehousing space and hybrid business space suitable for meeting modern occupier requirements, set against low levels of existing supply and historic development. This has created a challenging environment for potential and existing occupiers to fulfil their commercial property requirements within Bath and North East Somerset, and in particular, the city of Bath.

- 3.6 In terms of office floorspace the evidence notes that it is also possible that additional floorspace will be released to the market as a result of workplace transition following the rapid increase in hybrid working following the Covid-19 pandemic. However, there still remains a degree of uncertainty over the long-term trend. Market evidence also indicates a strong preference for high quality modern space with excellent amenity provision for workers. Additional space released to the market may require refurbishment in order for it to be attractive to modern occupiers. It has been noted that the loss of some of the sub-standard stock can support the market to develop new space through improved rents and values.
- 3.7 In terms of industrial floorspace, there is currently a substantial under-supply in Bath City, Rural Areas and the Somer Valley. The evidence notes that given the constraints within Bath City, the Keynsham sub-area is likely to need to play an important role in meeting some demand. Keynsham may also have a role in providing Research & Development space for growth sectors that can't be accommodated within the city. At the same time as developing new areas, it is acutely important to protect existing industrial estates and sites.
- 3.8 In relation to warehousing and logistics space historically there has been a lack of warehousing development activity that has taken place across Bath and North East Somerset. This is due both to its relative unattractiveness to modern occupiers and constrained land supply in the right locations, with the right access and infrastructure provision.

Need for Housing

- 3.9 The Economic Strategy also highlights that the lack of availability and affordability of housing is a key issue affecting Bath and North East Somerset and that this also impacts on the performance of our economy and wider sustainability issues. In order to underpin the Local Plan an assessment of housing needs across the District has been undertaken. This study is known as a Local Housing Needs Assessment (LHNA). The context for assessing local housing needs is also set by the National Planning Policy Framework (NPPF).
- 3.10 The overall need for housing in B&NES is for 725 new homes per annum, or 14,500 over the twenty-year Local Plan period. This figure is derived from calculations by the government, which is based on population and household projections which are then adjusted upwards to take account of the affordability (or unaffordability) of housing in B&NES. This is known as the 'standard method' housing figure. The standard method figure can vary year on year if the level of housing affordability changes e.g. if house prices rise or fall or incomes change. However, it is unlikely to change significantly when new figures are published next year.

- 3.11 The standard method housing figure is taken as the advisory starting point for determining local housing need and for establishing the housing requirement (amount of housing to be planned for) in the Local Plan. The Council appointed consultants to undertake a local assessment of housing need, which as required by government is also based on population and household projections and take account of market signals or affordability. Their assessment identifies a similar, albeit slightly lower, level of overall housing need.
- 3.12 Importantly their analysis shows that a significant proportion of projected population growth and therefore, overall need for new housing is comprised of projected growth in the student population.
- 3.13 The accommodation requirements of students are different to those of the rest of the population and for those aged 18-23 (primarily undergraduate students) are typically provided through student bedspaces e.g. in the form of Purpose Built Student Accommodation (PBSA). Given the significant student population growth it is proposed that the associated accommodation requirements are considered separately from general housing need in this Local Plan. The provision of additional student bedspaces in PBSA would reduce the amount of general needs housing required (see paragraph 3.17 below).
- 3.14 Based on population projections the LHNA suggests a growth in the student population aged 18-23 of around 7,300. This would equate to around 370 student bedspaces per year. Although it is appropriate to establish the overall student housing need using the projected growth of student population based on long term trends, it is also important to ensure alignment with the future growth aspirations of the University of Bath and Bath Spa University. The Council continues to work with both universities to understand their projected growth aspirations, however they are only able to provide projections up to 2030, leading to significant uncertainty during the second half of the Plan period. A set of scenarios based on different levels of growth are set out in the Student Accommodation Topic Paper.
- 3.15 The LHNA also provides more detail on the size, type and tenure of housing that is needed, including information on the need for affordable housing (key findings are summarised in paragraphs 3.16 to 3.19 below).

3.16 The plan period runs from 2022 to 2042. Some additional housing is already planned to be built on sites with planning permission and sites allocated for development in the current adopted Local Plan which runs until 2029. Sites with planning permission or allocated are known as existing commitments. Homes to be delivered on the existing commitments are deducted from the housing requirement to calculate the number of homes required to be planned for on new sites through the Local Plan. The spatial distribution of homes to be provided by existing commitments is illustrated in the map below.

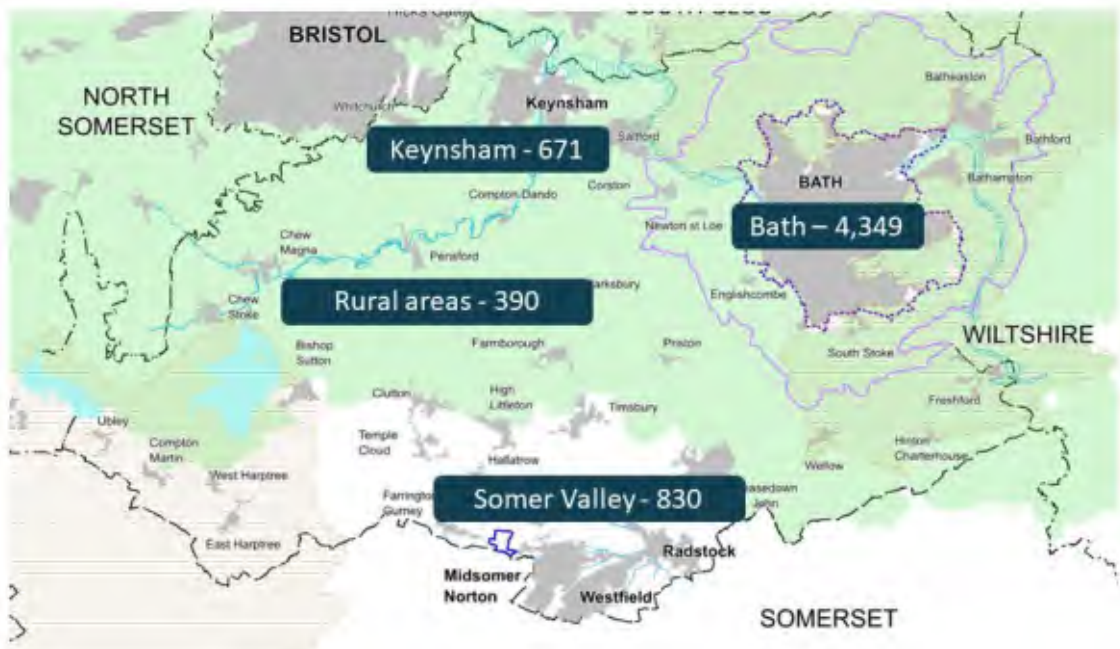


Figure 3: Map showing existing housing commitments

3.17 In preparing a Local Plan we are able to make an allowance for housing likely to be delivered on small windfall sites, that is sites that will provide less than ten homes and will be granted planning permission without being specifically allocated for development. A windfall allowance over the plan period has therefore been calculated. Up until 2029 and for the remainder of the adopted plan period the existing figures from the published housing trajectory have been used. Beyond 2029 a realistic and relatively cautious approach has been taken based on past rates of delivery. Small sites permissions have reduced over the past two years and therefore this is taken into account in the future allowance. The small windfall sites allowance will be kept under review in light of annual monitoring of housing delivery and permissions. Further detail is set out in the Housing Topic Paper.

Overall housing requirement	14,500
Existing Residential Commitments (including small sites with planning permission)	6,240
Expected Small Windfall sites (excluding small sites with planning permission)	2,080
Sub -Total	8,320
Housing to be planned for on new allocations (includes accommodation for students which needs to be considered separately)	6,180

- 3.18 It is not just important to plan for the overall amount of housing that is needed. The LHNA identifies that there is a significant need for housing that is more affordable in Bath and North East Somerset and this corroborates evidence underpinning the council's Economic Strategy. Affordable housing, as set out in the NPPF, has two main components i.e. housing that is needed for households that cannot afford market rents or prices to purchase, plus those households that can afford market rents but aspire to own their own home but cannot afford to do so. Based on both of those components the total need for affordable housing in Bath and North East Somerset is very significant and represents 77% of total housing need in the city of Bath and 31% of total housing need in the rest of the district.
- 3.19 Typically, the need for affordable housing of those that cannot afford to rent or buy will be met by either social rented accommodation or shared ownership homes (where the household buys a part share in the property). For those that can afford market rent but aspire to home ownership their need is typically met by either shared ownership or a discounted market housing product, such as First Homes (homes available to first time buyers at a discounted price). The LHNA provides more detailed information around the different types of affordable housing need in both Bath and the rest of the district. This shows that in Bath 36% of overall future housing need is from those households that cannot afford to rent or buy and 41% is from those that can afford to rent but aspire to home ownership. The equivalent proportions for the rest of the district are 21% and 11% respectively.
- 3.20 With regards to the type and size of housing that is required across the district the LHNA provides useful information split between the city of Bath and the rest of Bath and North East Somerset. More detailed information for specific places or parishes can be gathered through Local Housing Needs Surveys. The LHNA identifies the largest proportion of housing that is needed is for 3 bed houses (around 50% of overall housing need) in both the city and the rest of the district. There is also significant need for smaller dwellings, 1 and 2 bed flats and houses, (more than 26% of overall housing need) for smaller households e.g. younger people and older people looking to downsize.
- 3.21 Finally, the LHNA also provides useful information on the significant need for more specialist housing for older people, both market and affordable housing, as well as information on needs of those with particular accessibility requirements.

Need arising from neighbouring authorities

- 3.22 The NPPF requires authorities to respond to and assist in meeting the unmet needs arising in neighbouring areas, as requested through the Duty to Co-operate, where it is reasonable to do so having regard to the principles of sustainable development. In responding to this requirement the capacity of Bath and North East Somerset to accommodate its own housing need, as set out above, in a sustainable manner is highly relevant.
- 3.23 At this stage and with the exception of Bristol City Council the neighbouring authorities to Bath and North East Somerset have confirmed they are seeking to meet their objectively assessed need for housing within their respective administrative areas. As such there is no request to help meet any of their unmet need. Through the preparation of its Publication Draft Local Plan Bristol City Council have confirmed that they have capacity to provide around 1,925 dwellings per annum, or 34,650 over their Local Plan period. This capacity does not fully meet their locally derived housing need of 2,503 per annum or 45,054 over the Local Plan period. Bristol City Council have therefore, formally written to B&NES Council and also their other neighbouring authorities of North Somerset Council and South Gloucestershire Council, to request that we explore whether we could accommodate a proportion of their unmet locally derived need of 10,404 homes. B&NES Council response to this request will be carefully considered through the preparation of our Local Plan.

Climate Change

- 3.24 In 2019, B&NES Council declared a climate emergency, setting the ambition to lead the district to carbon neutrality by 2030. The Climate Emergency Strategy sets out the four strategic priorities, which are to: decarbonise buildings; decarbonise transport; increase renewable energy generation; and decarbonise the council's own operations. Planning should facilitate retrofit of existing buildings to improve energy efficiency, net zero new build developments, and increased renewable energy generation and storage to support our climate change ambitions.
- 3.25 Action to mitigate climate change cannot be taken in isolation of also considering how the district will adapt to the changing climate. Appropriate retrofit of heritage assets and increased renewable energy generation must be designed for the future climate, ensuring that their use continues to be sustainable. Improved resilience in the district can be achieved through an increase in nature-based solutions and green infrastructure, also supporting a range of further outcomes including health and wellbeing and active mobility.

- 3.26 As part of the Climate and Ecological Emergency Strategy we're developing an Energy Strategy that builds on studies identifying enabling greater renewable energy capacity through the community energy approach as the best delivery model. Aside from the Core Strategy targets of 110MW electricity and 165MW heating, there is a widely used target of 300MW installed capacity across the authority area that was identified to be of the scale needed to help the area become carbon neutral. However, varying external factors relating to decarbonisation of the grid mean that this figure is likely to vary with time.
- 3.27 The Council is part of a successful bid for Innovate UK funding for the West of England area that will enable the development of a Local Area Energy Plan in collaboration with the District Network Operator, that will identify detailed energy needs in terms of demand and infrastructure relating to the energy grids. This will help us to further refine our approach to planning and identify priority areas for delivery.
- 3.28 The constraints relating to grid connections (in particular those above 1mw) remain a consideration in the short term for planning, although changes in the way reserved capacity queues are managed means that larger connections may be possible in shorter timescales and should not therefore be seen as a barrier to large renewable installations.
- 3.29 There is an opportunity to utilise the emerging microgrid model for improving the carbon neutral new build policy adopted as part of the Local Plan Partial Update (LPPU). This model could further reduce the need for offsetting as part of the policy and enable greater carbon reduction. Given the greater electricity generation and consumption on new build properties due to electrification of heat and transport, consideration should be given to stipulating that new builds need to have a 3-phase electricity supply.

Nature Recovery

- 3.30 The Government is committed to an internationally agreed '30 by 30' target to protect 30% of our land and seas by 2030. In addition, the following targets are set in the government's 25 year environment plan:
- restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term
 - creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits

- taking action to recover threatened, iconic or economically important species of animals, plants and fungi, and where possible to prevent human induced extinction or loss of known threatened species in England and the Overseas Territories
- increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042

3.31 These targets are reflected in the nature recovery targets set for the West of England, which have been adjusted for Bath and North East Somerset.

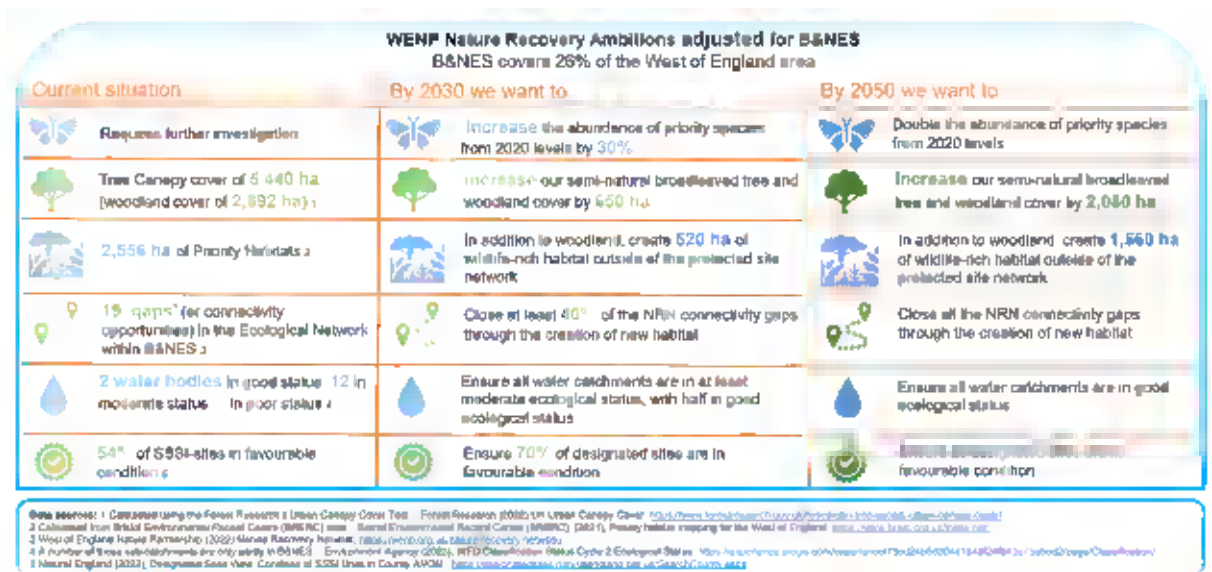


Figure 4: Diagram showing WENP nature recovery ambitions adjusted for B&NES

3.32 As set out in the Ecological Emergency Action plan there is a need to:

- Increase the extent of land and waterways managed positively for nature across Bath and North East Somerset
- Increase the abundance and distribution of key species across Bath and North East Somerset
- Enable more people to access and engage with nature

3.33 New development will need to play its part in delivering these ambitions and the council is considering requiring 20% Biodiversity Net Gain (BNG).

3.34 The council is also considering Natural England's 'Green Infrastructure Framework - Principles and Standards for England' (Green Infrastructure Framework), which includes standards for accessible greenspace, urban nature recovery, urban greening and urban tree canopy cover.

- 3.35 It is estimated that we need an additional 86.25 ha of accessible greenspace across Bath and North East Somerset for the new homes (not accounting for the increase in the student population and unmet housing needs in neighbouring authorities) if we are to meet the accessible greenspace standard of 3ha per 1,000 population.
- 3.36 The Environment Act 2020 stipulates that each region in England must produce a Local Nature Recovery Strategy (LNRS), which will 'establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits'. Local Plans must 'take account of' any relevant LNRS.
- 3.37 The relevant LNRS for B&NES is the West of England LNRS, which will cover the unitary authority areas of Bath and North East Somerset (B&NES), Bristol, North Somerset and South Gloucestershire.
- 3.38 Once the West of England LNRS is completed, it will be available to guide and inform the delivery of action for nature recovery. The areas mapped that 'could become, of particular importance for biodiversity' within the LNRS will also be used to define areas recognised as being of Strategic Significance within formal BNG calculations.

Needs for Health and well-being

- 3.39 The places where we live and work have a significant impact on how easy it is for people to live healthy lives, and influence our health outcomes. Therefore, the local plan offers an opportunity to shape development to create health promoting and inclusive places.
- 3.40 There is a clear emphasis throughout national policy and guidance on health and wellbeing in planning and placemaking. The NPPF states that planning policy should promote health and wellbeing. Paragraph 92 outlines that this should be achieved through promoting social interaction, making spaces safe and accessible, and creating places that enable and support healthy lifestyles. National guidance recognises health as a cross-cutting issue, which connects with and can be promoted by many policy areas within the Local Plan.
- 3.41 Key priorities of the B&NES Health and Wellbeing Strategy (2023) are to strengthen compassionate and healthy communities and create health promoting places. This includes utilising the Local Plan as an opportunity to shape, promote and deliver healthy and sustainable places and reduce inequalities. It also includes developing the infrastructure needed to build strong local communities and encourage proactive engagement in healthy lifestyles at all ages.

Transport Requirements

- 3.42 Transport systems and networks are important in terms of what they can enable, including mobility and access. Transport is a key contributor to wider societal benefits such as health and wellbeing, placemaking and economic growth. The choices that are made at Plan-making stage are integral to the sustainability of our District as a whole, such as the Spatial Strategy, where development is located, and how we choose to accommodate travel demand.
- 3.43 Our District requires mobility of people, goods and services to fulfil the needs of the population who live, work and visit B&NES. This demand for mobility will increase as a result of housing and employment growth to be facilitated through the Local Plan. This presents a core challenge to accommodate this increased mobility need whilst supporting progress towards our Climate and Ecological Emergency commitments.
- 3.44 We have made significant updates and improvements to transport policy in recent years, including through the LPPU and Transport and Developments Supplementary Planning Document (T&D SPD). Through the LPPU, we have substantially rebalanced transport policy towards sustainable modes, strengthening sustainability requirements for new development and set out detailed guidance in the SPD. We recognise that this is an early stage on our sustainability journey, and we need to continue on this strategic direction through the Local Plan and beyond.
- 3.45 Bath and North East Somerset has an ambitious vision to deliver the forecast growth within the Local Plan as part of its drive towards the decarbonisation of the transport networks across the district. At the heart of this vision is the need to ensure that people can get to where they need to go, and are able to access the facilities and services that they need, as sustainably as possible. We need to recognise that the UK's approach to transport for the last c.70 years is not working, and we cannot continue to predict and provide for worst case traffic levels with increased traffic capacity, enabling further growth in car usage. We need a change in approach where the transport network is rebalanced in favour of sustainable modes. This means a lot less emphasis on accommodating private car usage than has been the case historically which has led to car reliant communities and our places becoming dominated by cars. This is reflected through the following elements of our Transport Vision and Objectives:
- Positive contribution towards zero carbon mobility and climate resilience;
 - Equitable and inclusive access to transport for all;
 - Health and well-being of local communities; and
 - Create Better Places.

- 3.46 Our vision includes a presumption against building new roads for general traffic and increasing traffic capacity to deliver Local Plan growth. This is in line with LPPU Policy ST7. Including this in our vision sets a clear expectation that we will hold ourselves to our own high standards. We will ensure that this does not compromise the ability to deliver equitable and inclusive transport for all, by providing people with a range of travel opportunities to enable those that can travel sustainably to do so, potentially freeing up existing road capacity for those that do still need to use it.
- 3.47 The transport vision and objectives have been developed to underpin and guide the decision-making process for the Local Plan. It has taken account of adopted local policy and guidance including the Corporate Strategy 2023-2027, the Joint Local Transport Plan 4, the Journey to Net Zero Transport Plan and the Spatial Priorities of the Local Plan to create a cohesive framework for sustainable development.
- 3.48 The Corporate Strategy is the Council's overarching strategic plan and includes as one of its core policies the need to tackle the climate and ecological emergencies. In line with this our transport vision seeks to ensure that growth is delivered as part of the drive to decarbonise our transport network, making a positive contribution towards zero carbon mobility and climate resilience. As one of its core principles the Corporate Strategy also focusses on delivering for local residents. The Transport Vision and Objectives positively responds to this through the creation of more travel choices by improved connectivity for all and reducing the need to travel. Through this integrated approach the transport vision and objectives ensures that the Local Plan aligns with the Corporate Strategy, and broader transport policy aims, creating positive social, economic and environmental outcomes.
- 3.49 Our approach follows the sustainable transport hierarchy. In the first instance, we seek to utilise the Spatial Strategy, and following site selection process, to locate people close to the services and facilities that they need, e.g. employment, education, retail, leisure, public transport. Reducing the distances that people need to travel for their everyday needs, will increase their ability to make those journeys on foot or by bicycle. Our Transport Strategy for the Plan will provide greater travel choice for people, and enhance their ability to travel by sustainable modes. The Evidence Base documents set out greater explanation of the process we are going through to develop this Transport Strategy.

- 3.50 We recognise there are a range of challenges and opportunities for transport across the District, and that there is significant variation in levels of connectivity and car reliance. We also recognise that the planning process can only directly apply to new development, or redevelopment, limiting the scope of influence of the Local Plan. However, it is clear that in order to accommodate housing and employment growth sustainably, we must provide transport opportunities that enable people currently making trips by car to choose a more sustainable alternative. Enabling more people to travel by sustainable modes will create the “headroom” in our transport network needed to accommodate increased travel demand from new development in a sustainable manner. Thus, our transport approach will seek to achieve mode shift from existing trips as well as delivering new development as sustainably as possible.
- 3.51 Addressing the wide range of transport issues and opportunities people face across our District requires a holistic approach, delivered through the Local Plan and a range of transport plans and programmes.
- 3.52 We have embarked on a programme of transport strategy, scheme identification and modelling as part of the Local Plan process. This Options Consultation is a key stage in this process to set out initial ideas to the community and other stakeholders, to seek views, and to listen to ideas. Following this, we will develop the transport strategies and evidence base as we progress towards the submission and Examination of the Plan.
- 3.53 Our approach looks at the areas where options for growth are identified, and how people move within, between, and beyond these areas. We have consulted with representatives of the community, and undertaken our own research, looking at the existing issues in these areas and the potential opportunities to support the sustainability of each area. Transport Strategies for each area are being produced that will set out the changes needed to our transport systems to provide the capacity for future growth and increase sustainability of new development. Initial ideas are included within the Evidence Base for this consultation, and they will be developed through the Local Plan process.
- 3.54 We are also investigating strategic approaches to enhancing sustainable transport across the District. This includes improving the function of the Park and Ride sites to be “Transport Interchanges”, providing a greater range of travel options than car to bus, and into-out of city centre. We are also developing an Active Travel Masterplan for the District, to provide people with improved opportunities to travel by “walking and wheeling.”

4 Bath and North East Somerset Spatial Strategy Principles and Location Options

Introduction

- 4.1 This chapter sets out the fundamental principles that will guide the strategy across Bath and North East Somerset for accommodating new housing, employment development and supporting infrastructure, whilst addressing climate, nature and health and well-being needs. Sub-areas within Bath and North East Somerset are identified and their potential role is briefly explored, summarising key opportunities and challenges. Finally, site or location options that might potentially contribute to helping meeting the overall development needs (outlined in chapter 3) and therefore, a District-wide spatial strategy are summarised. The site or location options are then explored in more detail in the sub-area and place-based chapters that follow, including consideration of how the options for new development can address issues and priorities identified by communities.
- 4.2 Bath and North East Somerset has close relationships with the surrounding area. Therefore, the spatial strategy for accommodating development within Bath and North East Somerset also needs to be considered alongside the strategies in neighbouring authorities' Local Plans. The Unitary Authorities in the West of England (B&NES, Bristol City Council, North Somerset and South Gloucestershire), as well as Wiltshire and Somerset, will continue to liaise and co-operate in considering locations for development and the cumulative impacts.

Spatial Strategy Principles

- 4.3 The spatial strategy or approach to meeting development needs is underpinned by and will seek to achieve the spatial priorities of the Local Plan (outlined in chapter 2). Through the Local Plan the Council is seeking to plan for and facilitate the delivery of housing that is more affordable and allied to that, is ensuring Bath and North East Somerset remains economically prosperous and that the economy becomes greener, more sustainable and fairer. Development needs to respond to local needs and along with supporting infrastructure must progress our transition towards carbon neutrality and climate resilience, protect and enhance nature and promote healthy lives e.g. through minimising the need to travel by car and encouraging movement by walking, cycling and public transport.
- 4.4 The factors or principles that are particularly important in shaping the choice of locations for future development are summarised as:
- Sustainable transport connectivity
 - Climate change and nature

- Flood risk
- Historic environment
- Green Belt impact
- Local food production/agricultural land
- Infrastructure provision – challenges and opportunities

Sustainable Transport Connectivity

4.5 Being able to move around by sustainable means of transport, that is walking, cycling and wheeling or public transport, in order to easily access services and facilities, as well as places of work is vital in seeking to minimise carbon impact and addressing the climate emergency. Around 30% of carbon emissions in B&NES currently relate to transport. Since the covid-pandemic an increasing proportion of people work from home, however, at least some of the time, travelling to work is still an important journey for many, as well as regular journeys to access key services and facilities such as schools or local convenience shops. The maps below from the 2021 census provide a useful indication of the propensity to travel to work by car (as opposed to more sustainable means), as well as the distances travelled to work. The maps show that a greater proportion of people travel to work by car and travel a greater distance in the more rural parts of the District and also the Somer Valley.

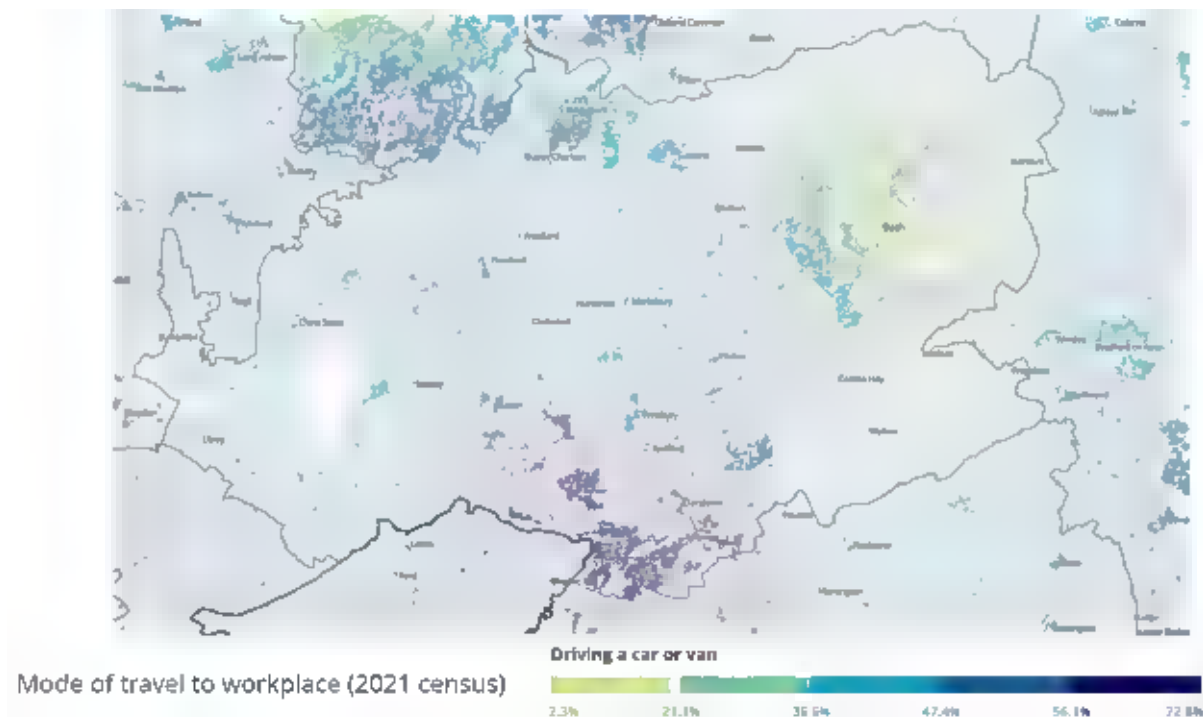


Figure 5: Extract from 2021 census showing mode of travel to work by car

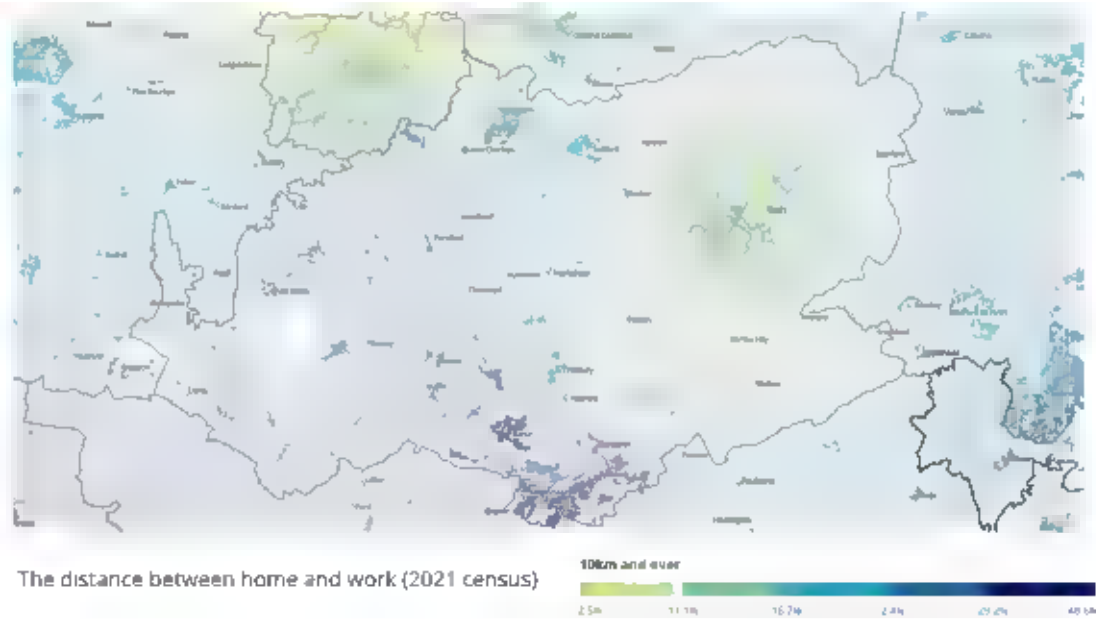


Figure 6: Extract from census 2021 showing distance travelled to work

4.6 Analysis has also been undertaken of broader connectivity of different areas across Bath and North East Somerset by sustainable means of transport to a range of important services and facilities, as well as employment areas. The map below provides a useful indication of the relative sustainable transport connectivity, with the areas in green/yellow as the best connected, moving through oranges and then red for the least well connected.

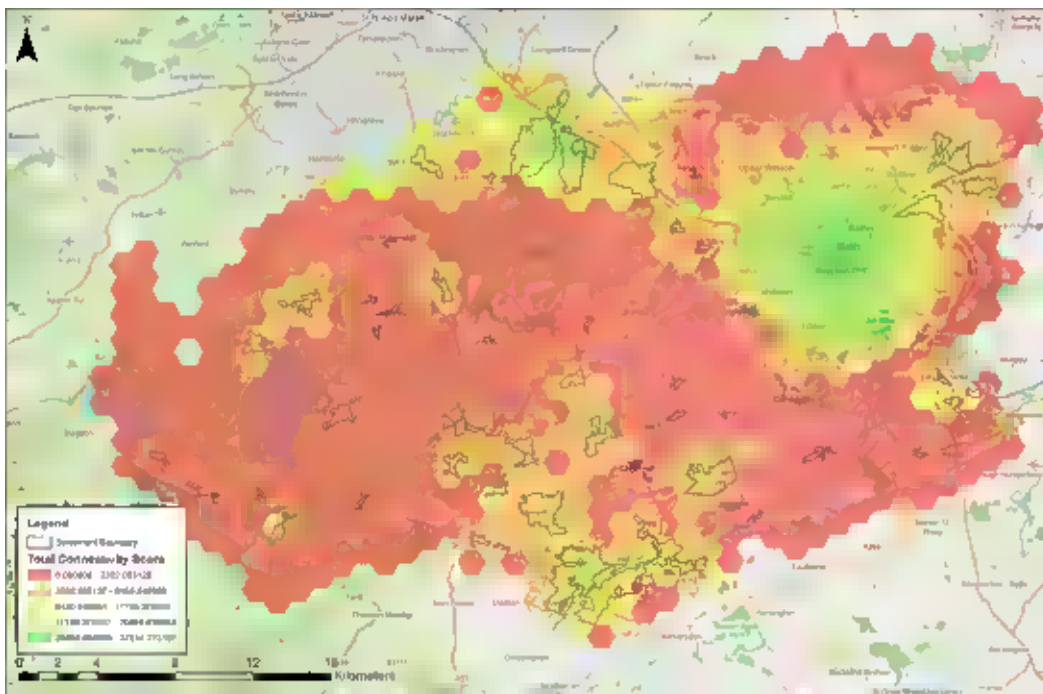


Figure 7: Relative sustainable transport connectivity across B&NES

Climate change and nature

- 4.7 Tackling the climate and ecological emergencies remains a top priority for the Council. It is critical that any new development aligns with our aims to tackle these emergencies. This will include how development is located and designed to promote accessible, sustainable transport (as set out above) and how our new and existing buildings continue to be decarbonised. While considering the challenges and opportunities for reducing our emissions, we must also plan for the changes in the climate that we are already seeing and will continue to see. Flooding (see below), overheating and other extreme weather events will increase in frequency and severity. Considering these climate risks is critical to the spatial strategy in order to minimise the potential climate impact in the locations of development.
- 4.8 The landscape within Bath and North East Somerset enriches people's lives and is an important influence on the location and form of new development. The attractiveness and character of the landscape should be maintained and enhanced for its own sake and because of the role it plays in residents' quality of life and its economic benefits. The quality of the landscape is evidenced through national designations shown on the map below, including the Cotswolds National Landscape and Mendip Hills National Landscape. In addition to these designations Bath and North East Somerset is covered by a range of different landscape characters that are valued by those that live and work in and visit the District, as well as important landscape settings to settlements.

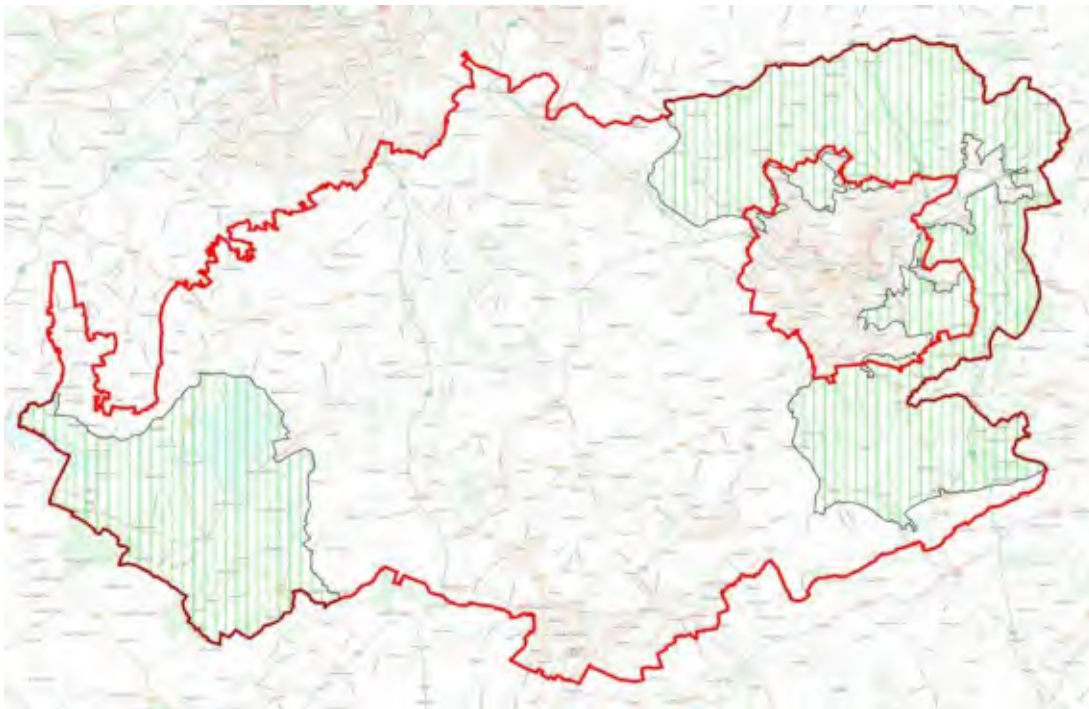


Figure 8 Map of B&NES with National Landscapes and World Heritage Site marked

4.9 In 2020 we declared an ecological emergency recognising the severity of the degradation of the natural environment and loss of wildlife, the consequences of this, and the urgent need to take action to restore nature. Protecting habitat and supporting nature's recovery (including through Biodiversity Net Gain) are important objectives for the Council. Opportunities to better facilitate nature's recovery are being identified through a Local Nature Recovery Strategy and supported by new and amended planning policy. The need to both protect priority habitats and facilitate nature recovery influence the spatial strategy and locations for development.

Flood Risk

4.10 Bath and North East Somerset includes many waterways. Ensuring that flood risk is properly taken into account is another important factor influencing the location of development and resilience to climate change. Flood risk is initially considered through reference to the Level 1 Strategic Flood Risk Assessment in identifying flood risk areas. The map below is taken from the latest SFRA (2022) and identifies flood risk zones. This informs a sequential approach to development locations, seeking to avoid locating vulnerable uses (e.g. residential development) in those areas at higher level of risk from flooding. The Level 1 SFRA is being updated to inform the Draft Local Plan. For some potential development areas or options a more detailed or Level 2 Flood Risk Assessment may be needed and this will also be undertaken to inform the next stages of the Local Plan.



Figure 9: SFRA Flood Zones

- 4.11 Opportunities to mitigate increasing flood risks resulting from climate change through nature based interventions will also be considered to inform the next stage of the Local Plan.

Historic Environment

- 4.12 In addition to the quality of its landscape Bath and North East Somerset has an historic environment that is of international and national significance. This is evidenced through a range of designations including the doubly inscribed World Heritage Site of Bath, numerous listed buildings, conservation areas and national Scheduled Ancient Monuments. The need to protect and enhance the significance of these heritage assets, including their settings, is also an important influence on spatial strategy and the location and form of development.

Green Belt impact

- 4.13 More than two-thirds of B&NES currently lies within the designated Bristol-Bath Green Belt. The Green Belt is designated to keep land permanently open. National policy outlines the five purposes of the Green Belt, summarised as follows:
1. Check the unrestricted sprawl of large built up areas
 2. Prevent neighbouring towns from merging into one another
 3. Assist in safeguarding the countryside from encroachment
 4. Preserve the setting and special character of historic towns
 5. Assist urban regeneration by encouraging the recycling of derelict and urban land
- 4.14 The Bristol-Bath Green Belt was originally designated in the 1960s, primarily in order to check the unrestricted sprawl of Bristol and Bath and to ensure the two cities and surrounding towns do not merge. Land can only be removed from the Green Belt and allocated for development through a Local Plan and only if 'exceptional circumstances' exist. The Green Belt in Bath and North East Somerset has remained largely unchanged, although land has been removed principally on the edge of Bath, Keynsham and Whitchurch for development through the B&NES Local Plan (2007) and Core Strategy (2014).

4.15 The Green Belt will be a further important influence on the location of development in the District. Development of land currently within the Green Belt may need to be considered through the Local Plan in order that the evidenced need for further housing and employment development (see chapter 3) can be met. To understand and consider the impact of potential development on the Green Belt an assessment of the Green Belt and the purposes served by different areas of land within it will need to be undertaken. An assessment across the West of England has already been undertaken and this will form the basis for more detailed assessment to support the Local Plan. The map below is taken from the West of England Green Belt assessment and illustrates the extent to which different land cells serve the nationally defined purposes of Green Belts. Those areas in darker colour more strongly serve a greater number of the purposes. It should also be noted that where development requires the removal of land from the Green Belt measures to improve and enhance the remaining land within the Green Belt will be required. This will be considered in preparing the Draft Local Plan. The quality of the image is poor due to being extracted from a third party online PDF. For a clearer view of the image, please see the original version in the WECA Green Belt Assessment [linked here](#).

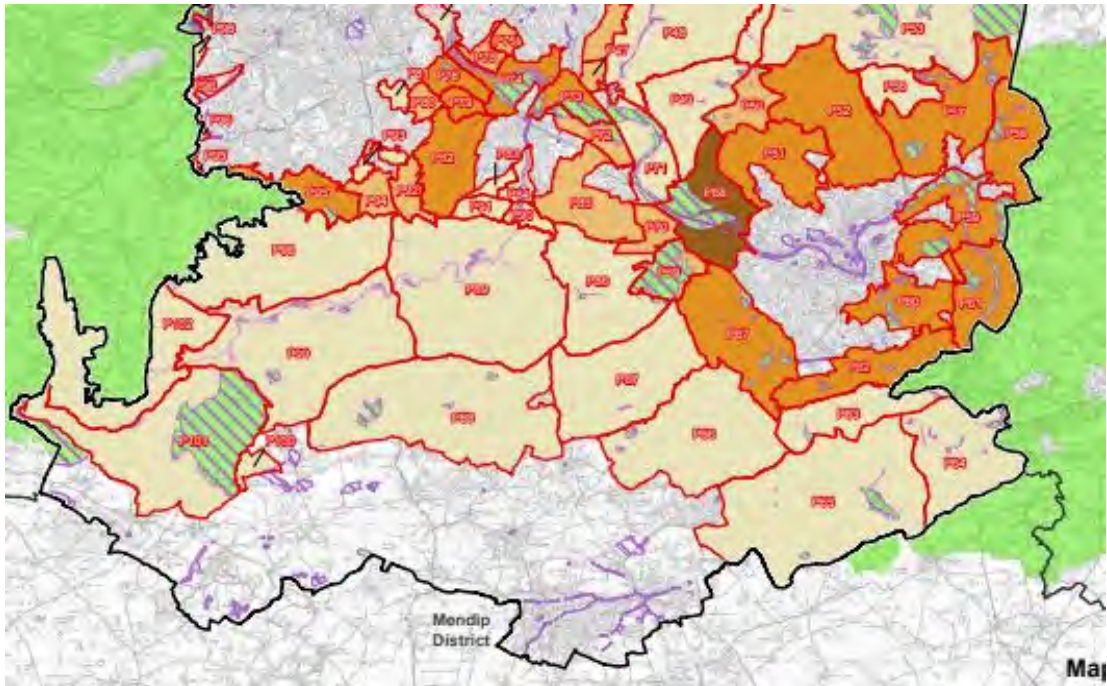
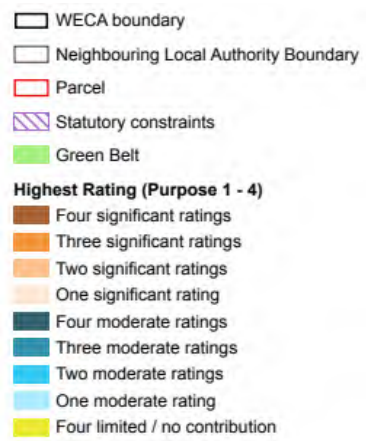


Figure 10: Extract from WECA Green Belt Assessment



Note: The number of purposes to which a parcel makes a particular level of contribution should not necessarily be taken as an indication of greater overall importance to the Green Belt purposes.

Local food production/agricultural land

4.16 Enabling local food production has a number of important benefits e.g. in terms of climate change and achieving carbon neutrality by reducing food miles, as well as benefitting people's health and well-being. In terms of using land efficiently it is also important to avoid the unnecessary loss of high-quality agricultural land. National policy makes it clear that the best and most versatile agricultural land should be protected, wherever possible, from significant development. The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the best and most versatile land and Grades 3b to 5 are of poorer quality. Data from the provisional ALC shows that the majority of B&NES is underlain by Grade 3 (good to moderate quality) land; however, further clarity is needed in some areas as to whether this land is Grade 3a (best and most versatile) or Grade 3b (poorer quality). The quality of agricultural land will therefore, influence spatial strategy and the choice of locations for strategic development, although further information on quality is likely to be required in preparing the Draft Local Plan.

Infrastructure provision – challenges and opportunities

- 4.17 It is crucial that new development is served by the timely provision of necessary supporting infrastructure e.g. schools, health and social care facilities, utilities, green infrastructure etc. The Council is a direct provider of some of this infrastructure and will identify requirements arising from any planned growth and seek to ensure timely provision to address such requirements. In addition, the council will continue to liaise with other external infrastructure providers e.g. utilities companies, in order to understand current deficiencies or surpluses in provision; what the infrastructure requirements are arising from new development; the most appropriate solutions and the barriers to delivering these solutions. Where barriers to infrastructure provision are insurmountable this would effectively prevent development taking place. Information from these discussions is referenced in the place-based chapters and in the Infrastructure Topic Paper
- 4.18 More detailed work on infrastructure requirements and delivery will be needed as the Local Plan progresses and the potential location options that are presented in this document are explored further. In addition to understanding the infrastructure requirements relating to individual development locations it will also be crucial to consider cumulative impact of development across a wider area both within and outside Bath and North East Somerset e.g. in relation to education and school places; health facilities; and transport. Solutions will therefore need to address both location specific and cumulative impacts. This work will be undertaken in collaboration with key infrastructure providers and agencies.
- 4.19 The council's Green Infrastructure (GI) Strategy is being updated using the new Natural England GI Framework (2023). The revised Strategy will guide delivery of the council's GI Policy and prioritising areas requiring investment to deliver multifunctional GI.

What do you think of the spatial strategy principles set out in this chapter and their relative importance? Is there anything else you think we should include? Please give reasons for your answer.

Sub-areas within B&NES

4.20 The District comprises a range of settlements many of which are spatially and functionally related to each other. Considering these relationships is important in looking at potential locational options for development. In order to aid this process and for the purposes of the Local Plan, Bath and North East Somerset has been divided into four main sub-areas, which are based around these connections and relationships. These sub-areas are illustrated on the map below. Some of the key spatial issues, opportunities and challenges in these sub-areas are briefly summarised below and are picked up in greater detail in the chapters which follow.

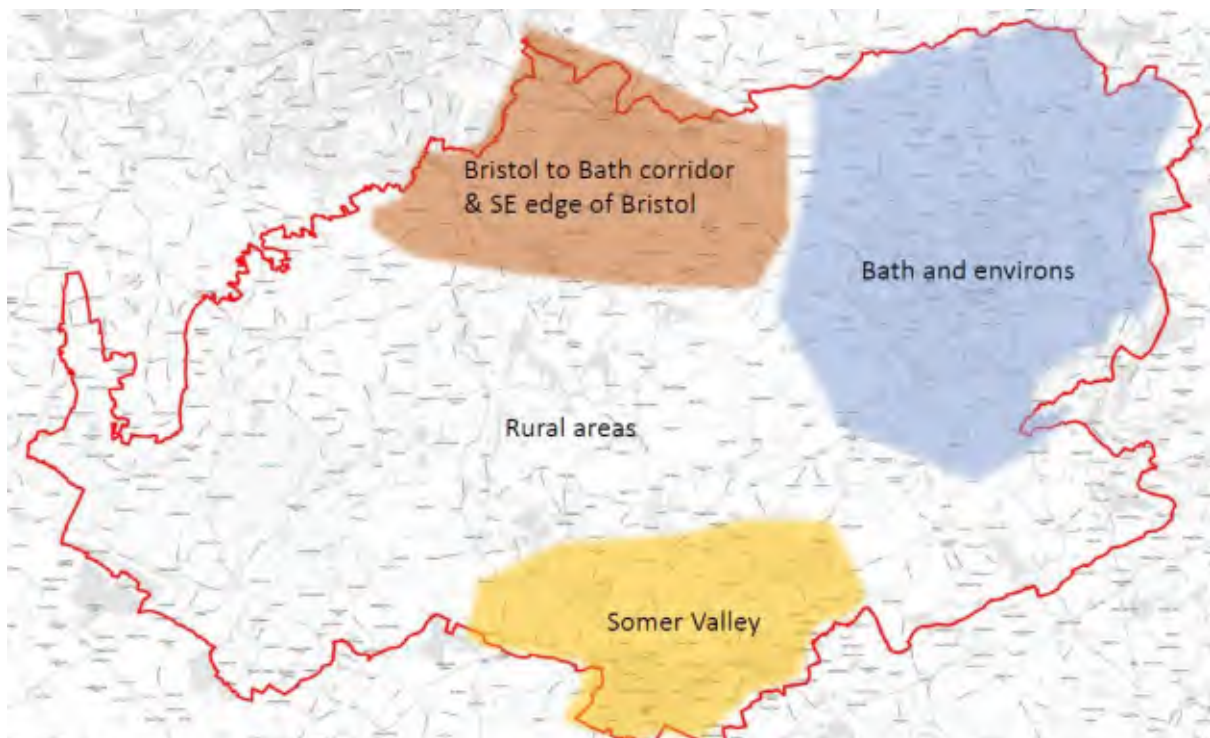


Figure 11: Map showing locations of sub-areas within B&NES

Bath and Environs

- 4.21 The city of Bath is the main economic centre and largest settlement within Bath and North East Somerset. As such it is the driver for much of the housing needed in Bath and North East Somerset and a focus for economic or employment space. The need for affordable housing is particularly acute in the city and as set out in chapter 2 this is the area of the District where housing is least affordable (with house price to earnings ratio in the city being higher than the rest of the district). The city also hosts two Universities, which also bring with them significant opportunities but also major impacts on the city's housing stock and communities. Bath is also a double-inscribed World Heritage Site, home to over 5,000 Listed Buildings and tightly surrounded by the Green Belt and two thirds of it is wrapped around by the Cotswolds National Landscape. Bath and its environs support key components of the Bath & Bradford on Avon Bat Special Area of Conservation and the city retains significant wildlife interest particularly linked to the river corridor, hillsides and green fingers that characterise the city.
- 4.22 There is substantial pressure for development arising from housing and economic needs within the city, where land supply is limited and at a premium. Brownfield sites need to be re-developed where possible and at optimum densities in order to ensure such land is used efficiently, but in a way that respects the city's sensitive context. Most of the significant brownfield sites have been redeveloped or are already committed for development and therefore, relatively few new brownfield sites available for development exist. Within this context the use of land within Bath needs to be carefully assessed and the needs which should be met must be prioritised. Opportunities for outward expansion of the city need to be explored, but are also constrained by the quality of the environment and designations. The villages that lie within the hinterland of the city are also of special character and development opportunities are similarly limited. Options for development and which needs should be met and how are considered further in chapter 5.

Bath to Bristol Corridor and South East Edge of Bristol

- 4.23 Settlements within the transport and river corridor that connects Bath and Bristol, most notably Keynsham and Saltford, but also other villages closer to Bath are well related to each other and accessible by public transport in terms of people's journeys for employment and services and facilities. Crucially these settlements are also well linked to Bristol and Bath by public transport, both bus and train from Keynsham. The south eastern edge of Bristol, in particular the Hicks Gate/Brislington area, also lies not far to the north west of Keynsham. In addition to this area the village of Whitchurch lies close to the south eastern edge of the city. However, whilst it is relatively well connected into Bristol it is important to remember that Whitchurch village is a separate and distinct settlement and community.

- 4.24 The comparatively good public transport links are an important characteristic of this part of the district. However, it should be noted the main highway routes also suffer from congestion, especially at peak times. Therefore, investment is needed to further improve public transport services and active travel links to help address it.
- 4.25 Land on the south east edge of Bristol and in the transport corridor linking Bath and Bristol lies within the Green Belt. Strategically this is an important part of the Green Belt in separating the two cities and the settlements that lie in between. The physical separation of not only Whitchurch village from Bristol, but also Keynsham from Bristol, and Keynsham and Saltford are also of great importance to the respective communities. In considering locations for development the need to retain, strengthen and enhance green infrastructure settlement gaps is crucial. As set out above land can only be released from the Green Belt for development through a Local Plan and only if justified by 'exceptional circumstances'.
- 4.26 The River Avon corridor and supporting sub catchments are an important ecological network for the region, connecting Bath to Bristol and the communities between. The River Avon corridor also provides an important recreational route and sustainable movement corridor that can be enhanced for active travel for existing and new communities, and for boat dwellers living on the river. The River Chew, which is particularly relevant in having helped to shape Keynsham, is an important tributary of the River Avon.

Somer Valley

- 4.27 The Somer Valley lies in the southern part of Bath and North East Somerset and adjoins the Somerset Council administrative area. For the purposes of the Local Plan the Somer Valley area focusses on the six closely connected settlements of Midsomer Norton, Radstock, Westfield, Peasedown, Paulton and Farrington Gurney. Other villages in the wider Somer Valley (such as High Littleton and Timsbury) are considered in the rural areas sub-area (see below). The Somer Valley has a rich mining and industrial heritage and a locally distinctive character, including a number of derelict coal batches of wildlife and cultural interest. It is important that the character of each settlement is respected in considering potential development locations.
- 4.28 There has been considerable recent housing growth in the area, delivered on a piecemeal basis, without the necessary supporting infrastructure keeping pace. In addition, out-commuting from the area to work is relatively high and has increased in recent decades due to economic restructuring within the area.
- 4.29 The Somer Valley is connected to Bath and Bristol by two major transport corridors (A367 and A37) and is relatively well served by public transport, although not as accessible to both cities as settlements in the Bath to Bristol corridor sub-area above.

- 4.30 Further significant investment is needed to improve public transport. Connectivity and safety improvements to the active travel network are also required. It is also important to deliver opportunities to improve local employment opportunities, including the Somer Valley Enterprise Zone, as well as delivering nature recovery and greater public access to greenspace.

Rural Areas

- 4.31 A significant proportion of Bath and North East Somerset is rural in nature. The rural areas are made up of several areas of attractive and distinct landscape and settlement character (e.g. the Chew Valley etc), as well as the Mendip Hills and Cotswolds National Landscapes. Areas of strategic importance for nature recovery are being identified through the Local Nature Recovery Strategy and through the work of the Bristol Avon Catchment Partnership, and West of England Nature Partnership. The high quality of the environment and opportunities to access the countryside, as well as the strong sense of community identity in villages, are important to local communities. The connectivity by public transport from villages to larger urban centres is variable and is poor in some of the smaller villages, which also lack services and facilities that can be accessed by walking, cycling or wheeling.
- 4.32 As is the case across the district as a whole there is a lack of affordable housing available in order to help meet local needs. Some housing development in villages can provide much needed affordable housing, as well as help to keep services and facilities viable and operating. However, it is important that any development in the rural areas meets the needs of those communities, respects locally distinctive character and is primarily focussed on those villages that are better connected through sustainable means of transport and have better access to key services and facilities.

Location Options

- 4.33 Through the selection of location or site options that can help to meet the overall need for housing, employment development and supporting infrastructure we must ensure that the Plan's spatial priorities are achieved. The key principles or factors outlined in the 'Spatial Strategy Principles' section above have shaped the choice of settlements and location options. Specifically, relative sustainable transport connectivity to employment opportunities and a range of key services and facilities was the starting point for identifying settlement and then location options. Consideration of the performance or impacts of these locations against the other spatial strategy principles, as well as a broader range of sustainability criteria has been undertaken and has influenced the selection of location options. The assessment of options (or 'reasonable alternatives') is outlined in supporting documents, importantly including the Sustainability Appraisal, the Housing and Employment Land Availability Assessment (HELAA) and the Area of Search Assessments.

4.34 Through the HELAA a broad range of opportunities or sites across Bath and North East Somerset have been considered; in terms of their suitability, availability and achievability. The sites considered encompass those that have been submitted as potential development opportunities by landowners, developers and other stakeholders, supplemented by sites identified by the Council where land in sustainable locations (primarily adjoining the main settlements) has not been submitted. The map below illustrates the range of HELAA sites considered across the District.

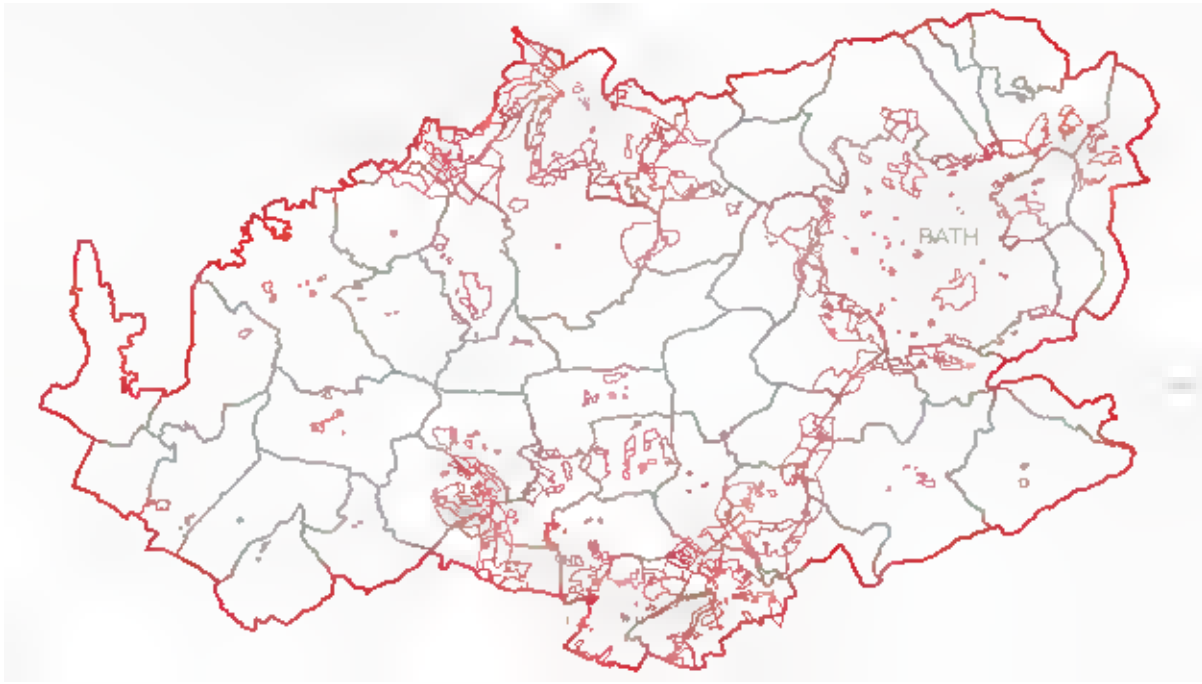


Figure 12: HELAA sites across B&NES

4.35 Those HELAA sites or groupings of HELAA sites assessed as being suitable, available and achievable for development that are located at the settlements identified as being options for the focus of strategic development have been considered against the spatial strategy principles referenced above and through the Sustainability Appraisal. This means that the broad range of HELAA sites has effectively been narrowed down to the potential options for strategic development illustrated on the map below. Those HELAA sites that lie elsewhere in the district, perform poorly against the spatial strategy principles or are otherwise constrained have not been identified as options. It should be noted that only locations or opportunities for strategic development (rather than smaller, more local sites) are shown on this map. In the villages, within the rural sub-area, site options are not identified at this stage. Rather the options document focusses on identifying villages within which potential site opportunities for Local Plan-led development will be considered through close working with local communities (this is further explained in chapter 8 below).

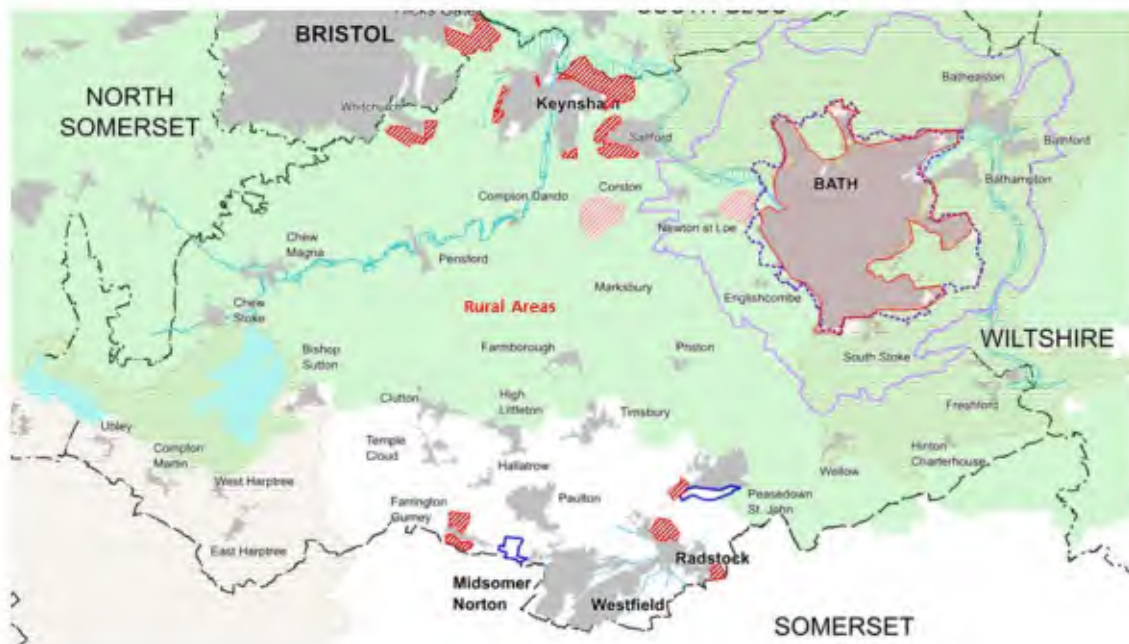


Figure 13: Map showing locations of strategic site options

4.36 The location options illustrated on the map are also listed in the table below. They are listed by sub-area and in order of their estimated housing development capacity, starting with the largest. The order in the table does not indicate a level of preference. Further information on the sustainability effects and climate impact of each of these location options is set out in the Sustainability Appraisal and Climate Impact Assessment which are available separately on the Council's website. The Climate Impact Assessment outlines the comparative or relative likely carbon impact of the location options and is helpful in also identifying measures that could be undertaken to mitigate or reduce carbon impact. The performance of locations in terms of sustainability and climate impact also gives a useful indication as to how well they align with the Doughnut Economics Model. It should also be noted that the table below does not include brownfield sites within Bath, smaller 'non-strategic' sites that could be allocated in the Midsomer Norton area (see chapter 7) or sites that could be allocated at the most sustainable villages (see chapter 8). These sites, alongside the location options below, would also contribute to meeting the need for new homes.

Location Option	Appx. housing capacity
North Keynsham	1,500
Hicks Gate	1,000
South Saltford	800
East Radstock	500 – 1,000
North Radstock	400 – 1,000
East of Whitchurch village	500
West and East of A37, Whitchurch	500
West Saltford	500
Farrington Gurney (north)	500

Farrington Gurney (south)	500
West Keynsham	100 – 300
Peasedown St John	200
East of Whitchurch village	150
West of A37, Whitchurch	150
Central Keynsham	40 - 100

- 4.37 A further option for strategic development in an area to the West of Bath has also been considered. As set out in the Bath chapter (chapter 5) it is considered, at this stage that this option is unlikely to be included in the Draft Local Plan as assessment shows that development would be very likely to cause substantial harm to the World Heritage Site.

Location Option	Housing capacity
West of Bath	500 – 1,000

- 4.38 The location options summarised in the table above are explored in greater detail in the place-based chapters that follow. Each of the options could play a role in helping to meet the identified overall housing and employment development requirements. We are seeking your comments on each of these location options and whether you consider they represent a good opportunity to address our need for housing and/or employment opportunities.
- 4.39 The location options listed and assessed (alongside other sites referenced in paragraph 4.30 above) will together comprise a District-wide approach or strategy in meeting development needs. The District-wide strategy will be set out in the Draft Local Plan published later in the year.
- 4.40 In order to inform the selection and preparation of the most appropriate spatial strategy the sustainability of different combinations of locations or strategy approaches across the District is tested through the [Sustainability Appraisal](#).
- 4.41 The testing of different strategy approaches through the Sustainability Appraisal enables the likely sustainability effects and advantages and disadvantages of different approaches to be identified.
- 4.42 Four strategy approaches are tested which include two based around accommodating the standard method derived housing need outlined in chapter 3 above, one with a higher reliance on Green Belt release (if justified by 'exceptional circumstances') to accommodate development and the other with a lower reliance on Green Belt release. In addition, an approach is tested that could potentially accommodate a higher level of growth (should this be necessary) requiring significant Green Belt release and one that excludes any Green Belt release and therefore, accommodates a lower level of growth. Comments are sought on both the individual location options (see questions in the place-based chapters below), as well as the B&NES wide spatial strategy which should be pursued in the Draft Local Plan and the related role of the different sub-areas.

What role should different sub-areas play in accommodating new development and supporting infrastructure?

What approach to distributing development across B&NES should be followed?

5 Bath and its Environs

Strategy Overview and Key Issues

- 5.1 The Local Plan is an important statutory document that sets out the key spatial issues, priorities and objectives for Bath and the planning framework for how this should be delivered. There are a number of complex and critical issues and challenges facing Bath, and a range of priorities that have emerged in discussions throughout the Council and through a period of stakeholder engagement.
- 5.2 This place based section of the Local Plan Options document sets out what the strategic issues and options are for Bath, and specifically, the spatial locations in which these can be addressed. It is a key role of the Local Plan to allocate new sites and protect existing sites for particular types of development and in this respect it is informed by robust evidence of objectively assessed needs. The Local Plan will also set out the specific requirements that each site needs to fulfil. This is complementary to content elsewhere in the Local Plan, particularly the Development Management sections that cover specific subject areas.

Place Profile

- 5.3 Bath is a relatively small city that has an international reputation. The city has a population of around 94,000 people and a larger catchment population who travel into the city for work and leisure. It is an expensive place to rent or buy property and many people live in surrounding towns and villages that better meet their housing needs. As well as high house prices Bath has a relatively low-wage economy (dominated by tourism/health/public sector jobs). There is limited land available in the city resulting in it being unable to meet all of its objectively assessed needs. Therefore, the Council has to prioritise which land uses it considers are the most important to deliver its objectives.
- 5.4 Economic growth in the last ten years has been sluggish and our lower-than-average wages cannot keep up with escalating costs of local housing. The council's Economic Strategy signals a new approach to local economic development which prioritises meeting the needs of all our residents and places whilst reducing impacts on our natural resources and environment.
- 5.5 The city has a vibrant cultural offer which supports its important role as an international visitor destination that attracts over 6 million visitors annually. It is a successful regional shopping destination, with below average vacancies.

- 5.6 Bath is a rare doubly inscribed World Heritage Site. This means that it is of international importance and of Outstanding Universal Value (OUV). It is within this context that the Local Plan manages how the city needs to evolve whilst avoiding harm to the OUV. Some examples would be protecting sensitive landscapes such as green hillsides from development or by guiding the height of new buildings. On the other hand, there are other attributes of the OUV that provide the inspiration for innovative and bold responses, and it is these that need to be embraced if we are to address some of the key issues that the city faces.
- 5.7 There is a comprehensive network of liveable neighbourhoods that support the local needs of the resident population and provide day to day facilities within close proximity to where people live.
- 5.8 Bath has two universities that together represent approximately 25% of the residential population. The University of Bath is the second biggest employer in the city. Whilst the universities bring many benefits that include a thriving student population that support a vibrant city, the expansion of both the universities creates tensions in other areas of city life. Significant pressures include the effect of this expansion on the existing housing stock and on development sites that need to be prioritised for housing that is affordable, and for meeting the employment needs through new office and industrial development.
- 5.9 Traffic congestion in the city is a major challenge, that has affected air quality. There is significant in and out commuting. Bath benefits from a mainline railway station with a half hourly service to London and frequent connections to Bristol, Keynsham and towns in Wiltshire. It is a very walkable city and the city benefits from a number of strategic cycle routes: the Bristol to Bath Railway Path, the Kennet and Avon Canal to Bradford on Avon and the Two Tunnels Greenway.
- 5.10 In formulating the spatial strategy for the city, a sound starting point is to review the existing spatial strategy for Bath and to identify where there are policy gaps, where it needs to be re-written and other areas where it's robust but might need evolving.
- 5.11 As with other places across the district there is a broad range of evidence that informs policy choices including: Climate Emergency Strategy & Ecological Emergency Action Plan, Local Housing Needs Assessment (LHNA), Economic Needs Assessment, Journey to Net Zero Transport Strategy, Health & Wellbeing Strategy, Economic Strategy and Cultural Strategy. Some other strategies are in the process of being commissioned including the Sustainable Tourism and Visitor Accommodation Strategy.

Key Issues

- Bath is of global importance, recognised by its double inscription as a World Heritage Site, which transcends national boundaries. In addition, the city has over 5,000 listed buildings, and an extensive conservation area that covers two thirds of the city. It is surrounded by the Cotswold National Landscape around three sides, and the Green Belt. A consequence of this is that there are limited opportunities for outward expansion and there is not enough land available to meet all of the city's objectively assessed needs and so priorities need to be made. One of the key roles of the Local Plan is to prioritise and set out the spatial distribution of different uses within the city.
- House prices in the city are very expensive and many people who work in the city choose to live elsewhere to better meet their housing needs. The Local Housing Needs Assessment (LHNA) identifies that the total need for affordable housing, comprised of social rent and low cost ownership, is very significant and represents 77% of total housing need in Bath.
- The Economic Strategy sets out ambitious proposals to address Bath's specific economic challenges and create a fairer, more prosperous and sustainable economy focussing on innovation and creativity. There is an identified need for more high quality office space in central locations, and industrial/hybrid business floorspace at a broad range of scales for established, growing and emerging sectors, to meet the city's economic ambitions.
- The city suffers from significant traffic congestion. 75% of people driving to work in Bath do so from outside of the city resulting in heavy congestion on those key corridors into Bath such as Bathwick Street, London Road, Lower Bristol Road, and the Wellsway. A clean air zone was introduced in 2021 due to exceeding legal limits of Nitrogen Dioxide in some locations.
- Flood risk and surface water run off will need to be managed to respond to increasing frequency of extreme weather events, using nature-based solutions wherever possible.
- The role of green space and nature recovery in supporting, invigorating and enhancing the city is critical to address the ecological emergency and providing access for people.
- Parts of some Wards in Bath experience inequalities in health and wellbeing outcomes, including Twerton, Whiteway and Foxhill, and the built and natural environment can play an important role in addressing inequalities

- There are existing residents within and outside of Bath who feel disconnected with or do not utilise all that Bath has to offer. The role of the built and natural environment in promoting places that are inclusive to people of all ages and abilities, as well as being health promoting more generally, will be important.

Priorities and Objectives

5.12 The following list sets out the key priorities and objectives for Bath. Many of the priorities can be addressed by new development, and site or policy approach options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan, or by strategies or initiatives undertaken by the Council or by other stakeholders.

- Provide the space to help create a fairer, more prosperous, innovative and sustainable economy within ecological and environmental limits. This will need to reflect our wide variety of needs from city centre offices and workspaces to larger industrial premises, advanced engineering, R&D and lab spaces.
- Deliver the right homes in the right places ensuring a greater diversity and choice of high quality, low carbon housing that is more affordable to meet the needs of residents and workers. As is the case across the district it is important that we build homes that are efficient to heat and that use clean energy, and which are fit for the whole life-course (young people, families, and into older age).
- Create opportunities to become carbon neutral and nature positive by 2030 and to become more climate resilient by enabling greater levels of building retrofit and integration of renewable energy solutions, low or zero carbon development, and the delivery of strategic Green Infrastructure and nature recovery projects such as Bath River Line and Bathscape.
- To set out a positive strategy for the conservation, enjoyment and understanding of the historic environment, and sustain and enhance the significance of the city's heritage assets including:
 - the OUV of the doubly inscribed World Heritage Site and its landscape setting, its listed buildings, the Bath Conservation Area and its setting, archaeology, scheduled ancient monuments and historic parks and gardens, and non-designated assets of local interest and value.

- Support the Bathscape vision with policies and supporting guidance to protect, promote and deliver the ambitions for a 'Landscape City'. This requires a transformational approach which will deliver nature recovery and climate resilience. By increasing the extent of land and waterways managed positively for nature and by protecting natural assets through investment in nature based solutions and wildlife friendly interventions that improve ecological network connectivity, the city will address the need to increase the abundance and distribution of biodiversity.
- Provide an ecosystem framework for Bath that will inform the design of development and its integration with ecosystem functions, networks and nature based services.
- Provide policy that supports delivery of the GI Strategy and other projects and initiatives that help deliver the framework. This will require a prioritising of a revised GI policy, and investment in green infrastructure on a par with grey infrastructure.
- Ensure policy that supports the delivery of the Health and Wellbeing Strategy, and as a 'Well-Being City', ensure that Bath's built and natural environments facilitate better health and well being for all, with beautifully designed and well-connected streets and spaces that reinforces its aspiration to be Europe's most walkable city, with cycling and wheeling infrastructure for all users. It will provide a diverse range of high quality leisure, play and community spaces for all ages, cleaner air, and improved access to green spaces and the surrounding landscape.
- Increase provision and quality of green infrastructure, delivering improved access to green and blue spaces and placing nature at the heart of any development opportunities.
- Support the diversification and long term sustainability of the University of Bath and Bath Spa University in their transition towards the provision of enterprise and innovation space, and the Locksbrook Creative Quarter.
- Enhance the role of the city as a place of vibrant, diverse and world class culture, building on its global reputation as a place of leisure and resort and as a wonderful place to live, to work and to visit. Ensure it is welcoming, safe, engaging, inclusive and enriching for all ages and abilities.
- Provide for a network of local centres and neighbourhoods that support day to day living and foster a strong sense of community engagement and involvement in local projects, and ensure the provision of community infrastructure.

- Bath's Journey to Net Zero Transport Plan (JTNZ) was adopted in 2022 and a key priority of the Local Plan is to help, where possible, with its delivery. The JTNZ sets out a plan to tackle some of the biggest challenges our society faces: combating climate change, improving air quality, improving health and wellbeing and tackling congestion. The plan identifies the changes needed to our transport system to create places we want to live and work; with better connected, healthier and genuinely sustainable communities, and alongside the new transport strategies, helps to underpin and support the Local Plan.
- Making it easier to travel sustainably within Bath as well as from neighbouring cities, towns and villages, by walking, wheeling, cycling and by public transport, as well as improving air quality in the city and reducing congestion.

**Do you agree with the key issues, priorities and objectives for Bath?
Please give reasons for your answer.**

The Capacity of the City

- 5.13 For good reasons, Bath is a constrained city. Its ability to expand outwards into the setting of the World Heritage Site is limited and building heights of new development in the city need to ensure that its character and important views are maintained and enhanced. A consequence of this is that the Council needs to carefully manage the land that is available and needs to prioritise those land uses that will deliver a city that better addresses the climate and ecological emergencies, is more sustainable in how people travel, more economically prosperous and meets our need for more housing that is affordable.
- 5.14 One of the key roles of the Local Plan is to seek to meet objectively assessed needs for housing, particularly affordable housing; economic space and other uses.
- 5.15 Given that Bath's lack of land was previously recognised in the formulation of the Core Strategy and the Placemaking Plan, a decision was taken then to prioritise housing and employment over other needs. The evidence available at the time informed the policy approach and sufficient land was safeguarded to demonstrably meet these priority needs. That meant that a more flexible approach could be taken for other land, notably in the Twerton Riverside area, to accommodate some of the other land use needs such as for Purpose Built Student Accommodation (PBSA).

- 5.16 Most of the PBSA that has been built since the adoption of the Core Strategy and Placemaking Plan has generally not been on land protected for the priority land uses, but on land where there was a more flexible policy approach to land uses i.e. Twerton Riverside, as well as on 'windfall' (or non-designated) sites such as the Cricket Club.
- 5.17 Given the scale of development that has been delivered over the past ten years or so, the amount of land left in the city is even more limited than previously. The Council has made it very clear that our key priorities are to optimise the delivery of housing that is affordable, and to safeguard existing and provide new employment space. These uses will therefore be the key priorities for the Local Plan.
- 5.18 Key pieces of evidence that support the Council's position are the Local Housing Needs Assessment (LHNA) which identifies what our specific housing needs are for the duration of the plan period, and the Economic Needs Assessment which has assessed the performance of different economic sectors and projected areas of growth. This report is clear that the city needs to protect existing space and deliver a total of 68,000 sqm new office and research and development space (including existing commitments). It also needs to protect existing and enable the development of between 30,000 - 41,000 sqm of new industrial (including replacement) floorspace, including for advanced engineering purposes, clean tech, health and life sciences and transport and storage. Some of the requirement for additional space will be met on sites that are already committed for employment development (sites with planning permission or allocated in the adopted Local Plan). These existing commitments will need to be reviewed in preparing the Draft Local Plan.
- 5.19 Given these land use priorities and their spatial needs, we then need to understand what capacity the city has to adsorb these needs: How much land do we have and how do we optimise its use, whilst also ensuring that we enable the delivery of exemplary developments that reinforce the city's important character and identity of the city? This spatial analysis is ongoing and will inform the Draft Local Plan.
- 5.20 A consequence of this approach is that there is highly likely to be less land available for other uses for which evidence might suggest that there is a need. A clear example of this is Purpose Built Student Accommodation (PBSA). As outlined above, a key role of the Local Plan is to mediate between different land uses and in doing so, particular land uses will not be permitted in specific locations (see also PBSA policy options in chapter 9: Development Management policies).

Site Options

- 5.21 Specific site allocations and development management policies that promote new development and protect existing land uses are effective planning tools for managing the use of land. Many site allocations already exist in the current Local Plan and they have generally proven to be robust in achieving their objectives.
- 5.22 It must be acknowledged though that some sites have not yet been delivered and this is normally related to the ability of the market to deliver. It is proposed to thoroughly review and modify the existing site allocations to ensure that they reflect renewed priorities of the Council, such as the climate and ecological emergencies and to demonstrate that needs are properly planned for.
- 5.23 The Council propose to allocate larger or significant development sites and that other opportunities for smaller scale or organic redevelopment and change (e.g. garage courts, change in local centres etc) will be supported by a facilitative and enabling policy framework.
- 5.24 To help diversify housing supply by encouraging smaller scale developers and self-builders, it is important for the Local Plan to embrace incremental change rather than expecting comprehensive development at a larger scale. This is often difficult to achieve and may never come forward due to complexities of land ownership. The policy framework will be supportive of incremental change and seek to simplify design and development requirements through design codes and guidance. Where appropriate, such as in the wider public interest, incremental changes will need to accord with wider spatial framework.
- 5.25 In addition, there could be opportunities to explore potential for improvements to the Foxhill and Twerton areas in Bath. Working with Curo, who manage much of the social housing stock in these areas, we could explore improving existing housing, including making it more energy efficient (providing carbon emission benefits in line with the climate emergency), more affordable to run and providing more comfortable and better living conditions. This could also offer the opportunity to improve the quality of place and potentially to increase the number of homes, thereby providing additional affordable housing (including social rented housing) which is needed. The overall number of homes also needs to be increased to be able to access Homes England funding.
- 5.26 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define the site specific interventions that are required.

5.27 There are a range of **potential** site allocations that are included in the Local Plan Options document, as follows:

- Existing [site allocations](#) refreshed and refined to reflect updated priorities and to address the climate and nature emergencies.
- [Newbridge Riverside](#) is proposed for a more fundamental review that will seek to protect its important employment role and optimise the potential development capacity of the area. This will entail protecting existing floorspace and enabling its evolution as an employment area to focus on industrial, advanced engineering, R&D businesses and the Locksbrook Creative Industry Hub. No residential, PBSA or University related activity (that is not in the above sectors) would be permitted.
- Other sites on the edge of or close to Bath:
 - During the preparation of the Core Strategy, the Council proposed a strategic allocation on three separate land parcels adjoining Weston and this was considered during the Examination stage by the Planning Inspector. All of the land was within the World Heritage Site, the Cotswolds National Landscape and the Green Belt. In addition, the land was identified as being part of the important green hillsides in the WHS Setting SPD, some of which was also part of the Bath Conservation Area. The Inspector concluded (para 184 of his report) that ‘the benefits do not clearly outweigh the harm that would arise to the AONB, the WHS and the conservation area ... and there are not the exceptional circumstances to justify removing land from the Green Belt or for major development in the AONB.’ The Inspector recognised that parts of the land proposed would have less harm than the whole allocation, suggesting that these might be considered in isolation at a future date.
 - The Council has not undertaken the detailed further assessment that is required to ascertain the degree of harm of smaller non-strategic sites, such as some of the component land parcels of this previously proposed allocation. There will be other non-strategic sites in different parts of the city too. The suitability of these sites and any other sites put forward as part of this consultation will need to be assessed as part of the preparation of the Draft Local Plan.
- Some assessment has been undertaken of those sites submitted as part of the Housing and Employment Land Availability Assessment (HELAA).
- A potential development location south of Burnett on the A39 has been included in this section for further exploration and to establish whether this has potential as a longer term location for growth.

- Land to the West of Bath is also considered as a potential option for helping to meet the development needs of the city. However, assessment shows that development here would be very likely to cause substantial harm to the World Heritage Site. Therefore, it is considered to be unlikely that an allocation for development in this location will be capable of inclusion in the Draft Local Plan. That said, it is included within this Local Plan Options document to help ascertain whether substantial public benefits can be identified that might outweigh this substantial harm.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Do you have any evidence or documentation that you would like to upload, to support your answer?

Site Allocations

- 5.28 A key purpose of this site allocations element of the Local Plan is to demonstrate how different land uses can be delivered, reflecting evidence and the priorities of the Council. Many of the sites/areas within the city set out below are already allocated in the adopted Core Strategy/Placemaking Plan. This Local Plan will review these allocations and set out our proposed approach.
- 5.29 The site allocations will also contain key development requirements and design principles to ensure that the development outputs contribute towards the creation of great places, that they seek to optimise the use of land, are properly integrated into and respond appropriately to their sensitive contexts, that they address the climate and ecological emergencies, and improve health and well being.
- 5.30 In accordance with National Planning Policy Framework (NPPF), there is a requirement to ensure that land is used efficiently whilst also creating beautiful and sustainable places. This contextual approach reflects the existing planning policy framework in Bath, where a set of [‘Design Values’](#) were established and which provide the context for considering the design of new buildings and as a means of creating authentic and locally distinctive and enduring places. These ‘Design Values’ continue to remain relevant in the consideration of new development proposals and in managing the potential tension between optimising the use of land and ensuring that development makes a positive contribution to local character and distinctiveness.

- 5.31 For all of the site allocations it is proposed, where relevant, to update the range of development requirements to include references to the need for a transformational approach to the protection and enhancement of biodiversity to deliver outcomes that genuinely contribute to nature recovery, whilst enabling new development, improving the relationship to the river, the integration of green infrastructure and the need for lighting in this location to safeguard the dark corridor for bats.

Milsom Quarter:

- 5.32 The Milsom Quarter Masterplan is a major regeneration project led by the Council that proposes that the area becomes the fashion destination for Bath and the South West. It has identified the Old Post Office as the site for the Fashion Museum, as a city centre cultural landmark, and the development of Broad Street Yards to support creative and entrepreneurial uses, complementing the fashion, interiors and homeware economies in the surrounding streets. It includes the [Cattlemarket Site](#), which is an existing site allocation that was recently updated as part of the Local Plan Partial Update (LPPU). The Milsom Quarter Masterplan also has an aspiration to introduce approximately 180 new homes through new build or through the repurposing of upper floors that are currently vacant.

Options:

- Option A: No change proposed to the existing policy covering the Cattlemarket site.
- Option B: Introduce other policies or site allocations such as for Broad Street Yard.

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

Bath Central Riverside

- 5.33 During the formulation of the LPPU, the council committed to review this site allocation, particularly in relation to the development of a new stadium, through this Local Plan. In the adopted Core Strategy the development of a sports stadium in the city is identified as an important element of the spatial strategy for Bath. Preparation of this Local Plan provides an opportunity to review the role of a sports stadium in the strategy and if considered still to be important, whether it should be delivered on this site. As such there are considered to be the broad options outlined below for consultation, as follows:

Options

- Option A: Retain the site allocation policy (Policy SB2) as currently worded.
- Option B: Review and amend the current Policy SB2 wording to provide greater clarity on or to change the development requirements and design principles.
- Option C: Delete the Policy SB2 reference to this site being appropriate for a new stadium.

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

Manvers Street

5.34 This site is an existing site allocation that forms part of a wider and major regeneration project that is being taken forward by the Council. It is anticipated that delivery will broadly reflect the current site allocation policy.

Options

- Retain existing policy requirements
- Update policy requirements to provide more flexibility in terms of the office space requirements by enabling a wider range of hybrid business space to suit start-up business and research & development space to be delivered.

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

Bath Quays North

5.35 The redevelopment of this site is currently identified as one of the Council's flagship regeneration projects and an area that will be transformed into the city's main business location to help to redefine the city's economic profile. Outline consent was granted for a comprehensive mixed use development in April 2019, but the delivery of this complex site has not progressed. The site will continue to be the key location for office led development but one of the proposed options is to slightly broaden this scope to enable a wider range of hybrid business space to enable start up business and research & development space to be delivered.

5.36 The proximity of the site to the rail station, its riverside and city centre location, with the facilities and amenities that it provides are key assets that contribute towards its appeal. It is proposed to update the policy to ensure it reflects the Council's priorities, including clarifying that Purpose Built Student Accommodation (PBSA) or student accommodation continues to not be acceptable as this will impede the delivery of other Council objectives.

Options

5.37 Two options in respect of this site are presented below:

- Option A: Retain the existing land use mix (primarily office space, Class E(g)(i)) and review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- Option B: Whilst ensuring this site continues to play a key role in the future economy of the city provide a greater degree of flexibility in terms of the land use mix required by policy. This could allow a change in the requirement to provide a 'minimum of 20,000 sqm of office floorspace' (Class E (g)(i)) and slightly broaden this scope to allow a wider range of hybrid business space to enable start up business and research & development space (E(g)(ii)) to be delivered. Continue to allow a residential element and continue to exclude student accommodation/PBSA.
- Note: Evidence from the Future Economic Needs Assessment and Office and Industrial Market Review recommends around 47,500 sqm of additional office and research and development floorspace should be delivered in the city throughout the plan period (in addition to that committed). To allow a reduction in this important location would add pressure on other scarce sites to meet this need. The existing policy states that 'redevelopment of this site is the Council's flagship regeneration project; it will be an area that will be transformed into the city's main business location and will help to redefine the city's economic profile.' Changing the site allocation approach should not undermine this objective.

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

South Quays and Riverside Court

- 5.38 This is a flagship development site that was granted planning permission in 2017 and has now delivered approx. 7,900sqm of office and creative workspace. No1 Bath Quays is Bath's first new speculative development for decades. The building provides brand-new grade A and EPC 'A' office accommodation. The refurbishment of Newark Works provides Creative Workspace that is owned and managed by TCN, a company that own and manage creative workspace. There is outline planning permission for a residential development parcel of around 60 apartments, but this has not been delivered.
- 5.39 Riverside Court is currently used as offices and there have been a number of applications for changes of use. The most recent application (20/03608/FUL) was refused due to the strong economic reasons demonstrating that the loss of office floorspace would be inappropriate.

Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- Allow more flexibility in relation to the delivery of the residential element within the existing allocation, allowing the consented floorspace in the South Quays site to change to an employment use. Housing not provided on this site would then need to be delivered elsewhere.
- The current policy for Riverside Court states: 'The redevelopment of Riverside Court should retain as a minimum the existing levels of employment floorspace and be complemented by residential development that contributes towards the city's housing requirements.' Should this policy wording for Riverside Court:
 - remain as it is;
 - be amended to provide more flexibility in terms of land use mix; or
 - be strengthened to require more employment floorspace to be delivered?

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

South Bank

5.40 This area lies immediately to the west of the South Quays site and to the east of Sydenham Park. It is under two principal and separate land ownerships; the car showrooms and the Travis Perkins Builders Yard. These uses are important functions within the city, however other uses such as offices and residential that optimise the riverside location, the close proximity to the city centre and the high levels of public transport accessibility, may well come forward within the plan period.

Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- The current policy for South Bank requires the total development to deliver a minimum of 5,000 sq.m. (GIA) of office floorspace, and a minimum of 100 dwellings. If the two parts of the site are to be delivered at separate times, then each part is expected to deliver an approximately even mix of uses. Purpose built student accommodation in this area is not acceptable as this would impede the delivery of other Council objectives. Should this policy:
 - Option A: remain as it is;
 - Option B: be amended to provide more flexibility in terms of land use mix; or
 - Option C: be strengthened to require more employment or more residential floorspace to be delivered?

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

Green Park Station West & Sydenham Park

5.41 This is a complex area, with a variety of site ownerships and a diversity of uses. It comprises the following components:

- Green Park Station West (SB7A):
 - Green Park Station, and the units facing James Street West.
 - Sainsbury's.
- Sydenham Park (SB7B):
 - Bath Riverside East: the former Homebase site and its car park, and overflow Sainsbury car park.

- Pinesway: Pinesgate offices and the associated road gyratory.
 - Pinesway Industrial Estate.
- 5.42 Due to this complexity and uncertainty, it is anticipated that delivery will be undertaken in a phased or piecemeal manner, with different landowners bringing forward development at different times, as and when their sites become available. However, to avoid the delivery of sub-optimal outcomes that do not deliver the wider opportunities in the area, it is crucial for the Local Plan to provide the urban design framework within which these individual developments can be delivered. This framework is acknowledged as needing to be flexible enough to respond to changing circumstances, yet it also needs to be robust enough to ensure that it can be delivered.
- 5.43 Developers and landowners are required to ensure that their individual development phases contribute positively to the delivery of this urban design framework and enable the vision for the wider area to be achieved. The affected landowners will need to work jointly to enable delivery, and to undertake a masterplan as appropriate. This should respond to the requirements set out here, and to the Bath Western Riverside SPD (2008) where relevant.
- 5.44 A planning application was allowed on appeal (September 2021) for the redevelopment of the Homebase site to provide a later living scheme of 288 units and 1,865 sqm of office floorspace. Due to the later living scheme being in the C2 use class it was not possible to secure affordable housing from the scheme. The consent enabled the subsequent demolition of the Homebase building, but apart from this, the scheme has not progressed.

Options

- Option A: Generally maintain current policy wording and update to better reflect the climate and ecological emergencies and review the alignment of the sustainable transport route through the site, if required.
- Option B: Review the proposed land uses on the site to reflect the evidence base and ensure that housing that is more affordable is delivered, that existing employment floorspace is protected and additional floorspace delivered.
- Option C: Create separate site allocations for each development parcel.

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

Bath Riverside

- 5.45 This large and important site has been delivering new homes for the city for the past fifteen years. It comprises of a number of different land parcels, and development on these parcels has largely either been completed, has the benefit of consent, or is subject to a current planning application. Changes were made to the existing policy wording to reflect the climate and ecological emergencies as part of the LPPU and there is considered to be little justification for any further changes at this stage.
- 5.46 It is proposed to devise a separate site allocation policy for the Westmark Site (see below).
- 5.47 No change proposed to the existing policy.

Question: Do you support this approach?

Bath Press

- 5.48 Planning permission was granted in 2015 for the demolition and redevelopment of the site to provide a residential-led mixed use development comprising 244 dwellings and approximately 1,500 sqm of flexible employment space. Since this time and apart from demolition, delivery has stalled. There has been a change in ownership of the site and a new planning application for a similar mix of uses has been submitted.
- 5.49 No change proposed to the existing policy.

Question: Do you support this approach?

Roseberry Place

- 5.50 Consent granted for mixed use scheme of Build to Rent residential and office floorspace. The former has been completed, whereas the office element has not progressed despite long periods of marketing.

Options

- Option A: No change proposed to the existing policy.
- Option B: Amend policy to allow a wider range of hybrid business space to enable start up business and research & development space to be delivered.

- Option C: Amend policy as above, but allow for mixed use development to potentially allow other forms of housing that meet identified need i.e. homes that are suitable for workers in the local economy, and not PBSA.

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

Westmark Site, Windsor Bridge Road

- 5.51 Currently this site is part of the [Bath Riverside Site Allocation Policy SB8](#). Given that no progress has been made on the delivery of this site and that planning applications are at an advanced stage on the remaining Bath Riverside sites, it is proposed to generate a separate site allocation for the Westmark Site.
- 5.52 Based on the 'Future Economic Needs Assessment and Office and Industrial Market Review' evidence base, the Victoria Park Business Centre, which forms part of this site, is to be protected from development. For the remainder of the site it is proposed to require a residential led development that includes the provision of specific housing products that better meet local needs. Purpose Built Student Accommodation (PBSA) is to continue to be excluded.

Question: Do you support this approach?

Stable Yard Industrial Estate

- 5.53 This is an industrial location, which is well occupied and contributes towards meeting an identified need in the city. Based on the Employment Needs Assessment evidence base, the Stable Yard site is to be protected from development.

Question: Do you support this approach?

Newbridge Riverside

- 5.54 This location comprises the Locksbrook Road and Brassmill Lane industrial areas and accommodates a wide range of businesses that perform a crucial role in the diverse economy of the city. Part of this area also includes the Locksbrook Creative Industry Hub (current [Policy SB22](#)), a collaboration with Bath Spa University, and the Fashion Collection Archive and which relates primarily to the creative arts sector.
- 5.55 There is considered to be scope to reimagine the role of this area and to intensify development opportunities benefitting the city's economy. Informed by the 'Future Economic Needs Assessment and Office and Industrial Market Review', the Council will commission a study to thoroughly understand the landscape, natural environment and heritage context of this location and generate an ambitious, deliverable, future scenario for how this current employment location could be reimaged. It is anticipating an imaginative and creative response to the untapped development potential of the area, that optimises the existing and planned transport infrastructure, set within an ecologically rich landscape that capitalises on its integral relationship with the river environment.
- 5.56 It is considered that this area has the potential to play an important, even iconic, employment role for the city, reflecting its global recognition, reputation, and history of innovation. Such an approach could complement the city's central office and workspace core and provide a more diverse employment space offer for the creative industries sectors, advanced engineering sector (such as many of the existing anchor businesses), research and development, biosciences, and other sectors that have specific spatial or operational requirements.
- 5.57 The future scenario will need to set out a range of different options in which this role could be achieved.

Options

- Option A: Intensify the development potential of this area, in terms of capacity, and clearly define the range of industrial related uses that are appropriate for this location including industrial, advanced engineering sector (such as many of the existing anchor businesses), clean tech, health and life sciences, transport and storage, and creative industries. This option would ensure this area continues to serve as the main location for industrial space within the city. Identify those uses that would not be permitted, i.e. residential and PBSA.

- Option B: Within a clearly defined landscape and ecological framework and infrastructure plan should the site allocation have a consistent approach across the whole of the 'Newbridge Riverside' or should it be more granulated and have different approaches in different parts? This could allow a more nuanced approach tailored to the specific characteristics and potential of the different areas. For example:
 - Locksbrook Road: comprising Horstmann, Bath Spa University, the Locksbrook Creative Industry Hub including the Fashion Collection Archive, various operations including trade counters.
 - Brassmill Lane: Mix of industrial type uses and trade counters including the Maltings trading estate, larger employers and manufacturers such as Rotork and Roper Rhodes.
 - This could include Weston Island or this could be maintained as a separate allocation (see below)

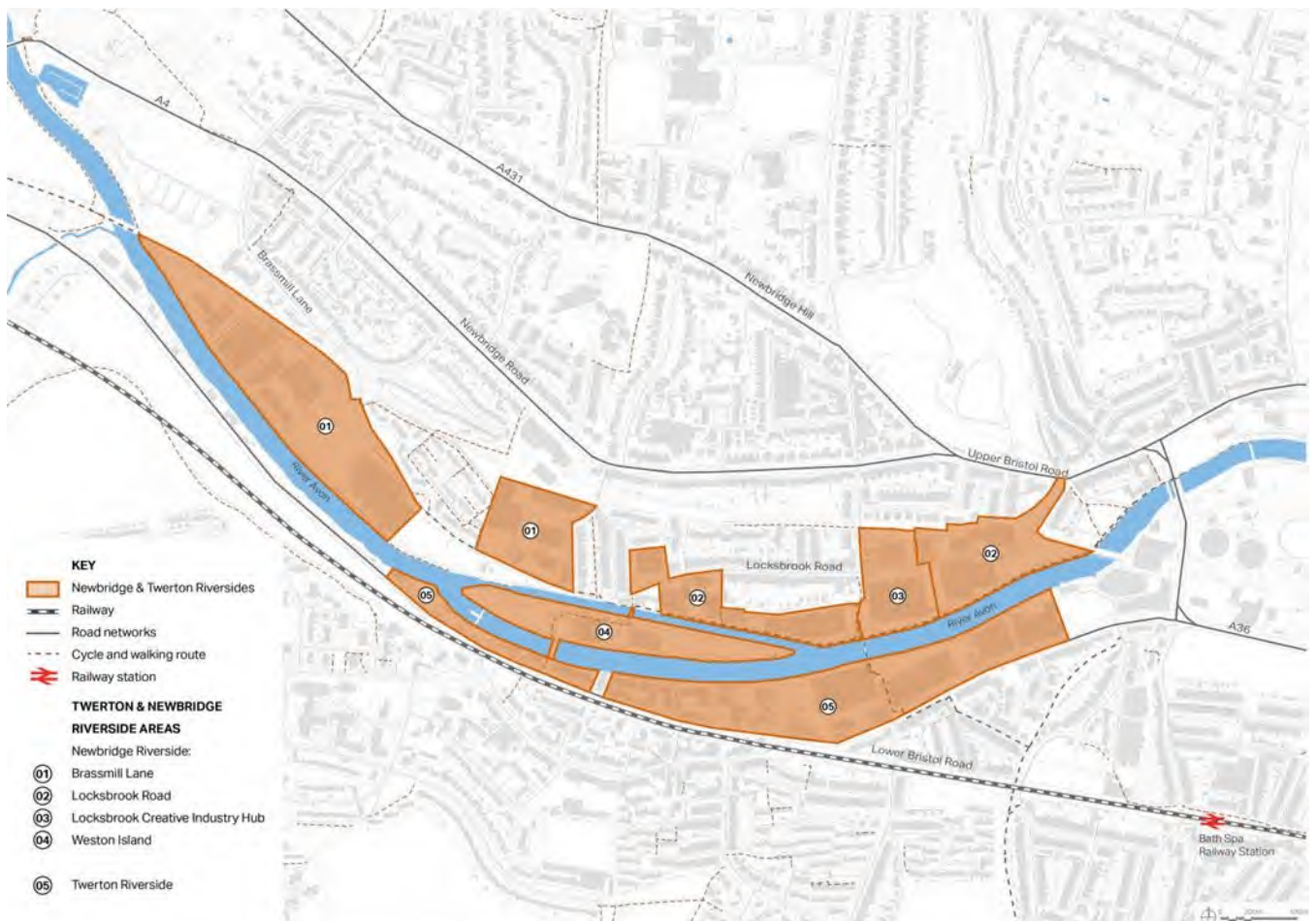


Figure 13a: Newbridge and Twerton Riverside Policy Areas

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

Weston Island

- 5.58 The existing policy was prepared to enable the relocation of businesses from central area sites to allow these to be redeveloped for mixed use regeneration. For various reasons, it is now looking more unlikely that these uses will relocate to this site and so it is necessary, subject to whether First Bus decide to remain on the site or to relocate, to consider alternative options for Weston Island.
- 5.59 This is an existing employment site with very good access directly to the Lower Bristol Road. With evidence from the Future Economic Needs Assessment and Office and Industrial Market Review, there are very sound planning reasons to retain an industrial focus for this site. It is also in Flood Zone 3 which precludes residential and other uses.
- 5.60 Notwithstanding the evidence to retain the site for industrial purposes, there is an aspiration from Bath Art Depot (BAD) to reuse the existing buildings and remainder of the site. They would provide much needed studio space for artists, maker spaces with access to facilities, exhibition venues, space for community-led events and a location where local businesses can offer food, drink, retail and entertainment. This would also involve a diverse programme of creative learning and training, working with Bath's schools, universities and other community organisations and institutions. Under this scenario Weston Island would host exhibitions and events of national and international relevance.
- 5.61 Whilst this concept is supported in principle, there is currently no evidence of how this could be delivered and therefore it is not reasonable, at this stage, for the Local Plan to seek to allocate land for this purpose. The Local Plan will however continue to be supportive of the concept, with the potential allocation being related to whether further evidence regarding its deliverability can be demonstrated during the production of the Local Plan. It should also be borne in mind that the use of the site for these purposes might impede the Council's delivery of its other economic priorities, such as reusing the site for industrial purposes.
- 5.62 Bath Spa University has an aspiration to deliver and evolve the Locksbrook Creative Industry Hub and there could be potential to utilise Weston Island as part of this. If this concept provides employment floorspace it has the potential to contribute towards the vitality and vibrancy of the wider area. Purpose Built Student Accommodation (PBSA) and teaching space would not be supported.

5.63 One of the specific requirements in the current site allocation policy is to 'Provide a welcoming, spacious and safe public sustainable transport link across Weston Island and its respective bridges and provide high quality public realm.' It then goes on to state that 'there may also be opportunities for more public facing uses such as creative, arts based activities. Such uses could help to animate and overlook this new link'. Therefore, proposals from Bath Spa University as part of the Locksbrook Creativity Hub concept and/or from Bath Art Depot, could be appropriate uses to 'animate and overlook this new link'.

Options

- This site could be protected for industrial uses in line with the Newbridge Riverside area as outlined above. This would effectively mean this site is a sub-area of a wider Newbridge Riverside allocation.
- Alternatively and subject to the space requirements of particular uses, there may be potential to combine the industrial land use requirements with some or all of the, Locksbrook Creative Industry Hub and Bath Art Depot elements

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

Twerton Park

5.64 This policy was updated in the Local Plan Partial Update.

5.65 No change is proposed to the existing policy.

Do you support this approach?

Royal United Hospital (RUH), Weston

5.66 The RUH have commissioned a new Estates Strategy for this site. Once this has had final sign off within the RUH Bath NHS Foundation Trust it is the intention, subject to review, to include reference to it and support its delivery, as appropriate, through the Local Plan.

5.67 There is strong evidence that the lack of availability and affordability of housing is making it difficult for some employers to attract and retain staff. Where these employers control or own land, such as the RUH, there could be opportunities to facilitate the delivery of employer linked housing that is 100% affordable.

- 5.68 Provided that land will not be required for healthcare or car parking during the Plan period, the council supports the provision of 100% affordable residential accommodation (Class C3) of a range of sizes and types, for use by key workers associated with the RUH.
- 5.69 Changes to the existing policy will be considered in the context of the new estates masterplan.

Do you support this approach?

Hartwells Garage

- 5.70 Outline planning permission for a mixed use development comprising up to 104 residential units and the provision of up to 186 student bedrooms site was granted on appeal in March 2021. Progress on delivery has been delayed but is understood to still be progressing.
- 5.71 No change proposed to the existing policy.

Do you support this approach?

Sion Hill

- 5.72 Owned by Bath Spa University (BPU) and currently allocated for housing. This site was allocated in the LPPU and the policy is considered to remain fit for purpose.
- 5.73 No change proposed to the existing policy.

Do you support this approach?

St Martins

- 5.74 Recently introduced and allocated in the LPPU and the policy is considered to remain fit for purpose.
- 5.75 No change proposed to the existing policy.

Do you support this approach?

Sulis Down

- 5.76 The site was removed from the Green Belt and allocated for development in the Core Strategy. The extent of the site allocation and policy requirements responded to key elements of the evidence base relating to the harm to the World Heritage Site and its setting, as well as important heritage assets such as the Wansdyke. Phase 1 of the allocation is nearing completion and there is a current planning application for the comprehensive masterplan and for phases 3 and 4. It is a very sensitive development site and given that the evidence relating to harm has not changed, it is not proposed to amend this site allocation.
- 5.77 No change proposed and continue to protect the field to the south of the Wansdyke and the field to the east, adjacent to Southstoke Lane.

Do you support this approach?

Englishcombe Lane

- 5.78 This is an existing site allocation for residential development. There have been significant concerns from local residents about a number of issues including ecology, drainage and land slip issues. Despite this, it is considered that this site is capable of being developed for residential uses.
- 5.79 No change proposed to the existing policy.

Do you support this approach?

Burlington Street

- 5.80 This is an existing site allocation that is considered fit for purpose.
- 5.81 No change proposed to the existing policy.

Do you support this approach?

University of Bath

- 5.82 The policy framework for the University of Bath was subject to significant review as part of the Local Plan Partial Update. It was informed by a new Masterplan that provided a vision of the future for the Claverton Campus, enabling the delivery of the development and infrastructure required to address the needs and expectations of its students and staff, and to facilitate the University's sustainable growth in a manner that also enhances the unique beauty and environmental quality of the campus.
- 5.83 Whilst the existing policy is robust there could be the possibility of exploring whether more PBSA could be provided on campus to help facilitate growth in student numbers without impacting further on the city. This could only be achieved through the review of current car parking provision or through intensifying existing developed areas of the campus (without increasing heights or creating other adverse impacts).

Do you support this approach?

Sulis Club

- 5.84 This is a sports ground owned by the University of Bath. It is on a gently sloping site on the edge of the plateau in a highly sensitive skyline location on the edge of the World Heritage site, and visible from the surrounding countryside.
- 5.85 The current policy SB19 states: Sulis Club Outdoor Sports area – Proposals for development will be judged against national planning policy within the NPPF, including that relating to AONBs and Green Belt, as well as the World Heritage Site and its setting and Outstanding Universal Values. For the Sulis Club this enables the appropriate redevelopment of previously developed land, within the parameters set by the NPPF.

Options

- No change to current policy SB19.
- Consider and gather evidence relating to potential development on this site which is compatible with the requirement to protect the OUV of the WHSs and which will strengthen the important well-treed skyline.
- Do you have any comments on this?

Bath Spa University at Newton Park

- 5.86 Bath Spa's Newton Park Campus sits within a sensitive historic context including in the core of a registered (Grade II*) historic parkland 'of outstanding interest' which includes a Scheduled Monument (St Loe's Castle), three Grade I listed buildings (The Manor House, Castle, and Castle Gatehouse); one Grade II* listed building (the Stables); and one Grade II listed building (the Dairy). The walls to the Italian Garden are also listed (Grade II*). The wider parkland beyond the campus also contains part of the Wansdyke Scheduled Monument and other listed buildings.
- 5.87 The campus lies in the Green Belt where development potential is constrained i.e. national policy makes it clear that development is inappropriate unless it is either complete or partial redevelopment or limited infilling as long as it doesn't have a greater impact on openness than the existing development
- 5.88 Ecologically the campus hosts a number of lesser horseshoe bat roosts, which forage in the surrounding parkland. Both the campus and the parkland in which it sits are within the Green Belt.
- 5.89 No material changes are proposed to the existing policy, however it will need to be reviewed and updated to reflect the latest terminology and correct references in the NPPF.

Do you support this approach?

West of Bath

- 5.90 One of the locational options that has been considered to help address the development needs of Bath is land to the west of the city (see plan below). This area could have potential to provide housing that is more affordable, new office or industrial buildings, or potentially to relocate the existing Newbridge Park and Ride, thereby freeing up the existing site for other forms of development.
- 5.91 The provision of development as outlined above could deliver public benefits and help to address objectively assessed needs, but this has to be weighed against the likely harm that development could cause to the World Heritage Site (WHS), particularly to the attribute of 'the green setting of the city in the hollow in the hills' and impacts on the setting of the Cotswolds National Landscape. To evaluate this, the Council commissioned Land Use Consultants (LUC) to undertake a technical evidence assessment of the potential impacts of a range of development typologies in land to the west and south of Bath.

5.92 Whilst development to the West of Bath could have public benefits, the assessment by LUC shows that it is very likely to cause substantial harm to the World Heritage Site (WHS) and its setting and that this harm cannot be satisfactorily mitigated. It would also cause harm to the setting of the Cotswolds National Landscape.

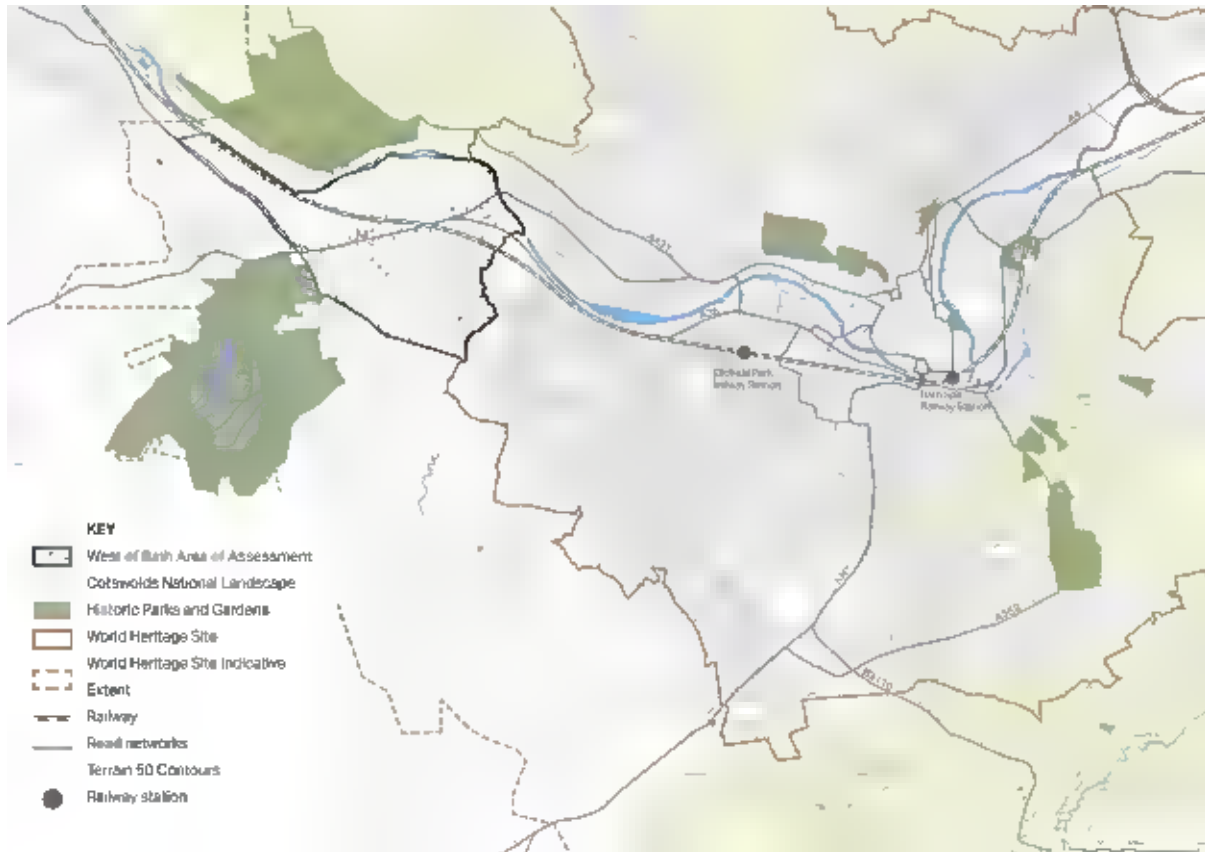


Figure 14: Map showing West of Bath area for the LUC assessment into potential impacts of development

5.93 The NPPF makes it clear that substantial harm to the WHS should be 'wholly exceptional'. In addition, the NPPF makes it clear that protection and enhancement of a heritage asset should be given great weight and that as a WHS is the most significant asset, it should be given the greatest weight.

5.94 Growth of the city west of Bath and causing substantial harm is also likely to be of significant concern to UNESCO (particularly given the double inscription of the city) and this would also affect the other Spa Towns that are part of the Great Spa Towns WHS inscription which includes Bath.

5.95 The LUC assessment identified that harm caused to the Outstanding Universal Value of the WHS by the types of development tested is intrinsic and unavoidable because it will fundamentally alter the character and appearance of the areas as undeveloped agricultural land that provides the green setting for the city. This is considered to be an 'in-principle' issue that could not be overcome by design. No heritage benefits have been identified for any of the areas assessed.

- 5.96 Given the LUC assessment and the national policy context outlined above, it is considered at this stage that an allocation of land for development West of Bath is unlikely to be included in the Draft Local Plan. That said, it is included within this Local Plan Options document to test and ascertain whether substantial public benefits can be identified that would outweigh the substantial harm.

Green Belt

- 5.97 In addition to identifying substantial public benefit and whether this outweighs harm to the WHS and its setting, this location also lies within one of the most important areas of the Green Belt and the impact of development on the Green Belt would need to be carefully considered.
- 5.98 Exceptional circumstances would need to be demonstrated in order to justify removing the land from the Green Belt. Whilst such 'exceptional circumstances' are site specific this broadly means demonstrating that reasonable alternatives outside the Green Belt have been considered and rejected and that harm to the Green Belt is outweighed by the benefits of development.

Do you consider that development in this area could provide substantial public benefits that might outweigh the substantial harm to the World Heritage Site? If so, what are these public benefits?

Do you consider that these public benefits also demonstrate 'exceptional circumstances' that justify removal from the Green Belt? Please explain why and what 'reasonable alternatives' should be considered.

Are there specific sites or areas in the west of Bath location that you think should be considered?

South of Burnett, adjacent to the A39

- 5.99 This location has been identified as a potential long-term opportunity for a standalone development or new community that could help to address objectively assessed needs either towards the end of the Local Plan period or beyond the plan period as part of a longer-term spatial strategy. The council is seeking views on whether stakeholders consider it should be explored.
- 5.100 It is included in the Options document to assess the potential issues that would need to be considered and whether this area has any merit for further discussion and exploration. The map below indicates a broad area of search. The area is identified as causing less harm to the landscape than other locations close to Bath, although woodland planting would be required in the area to the west as screening to the Chew Valley.

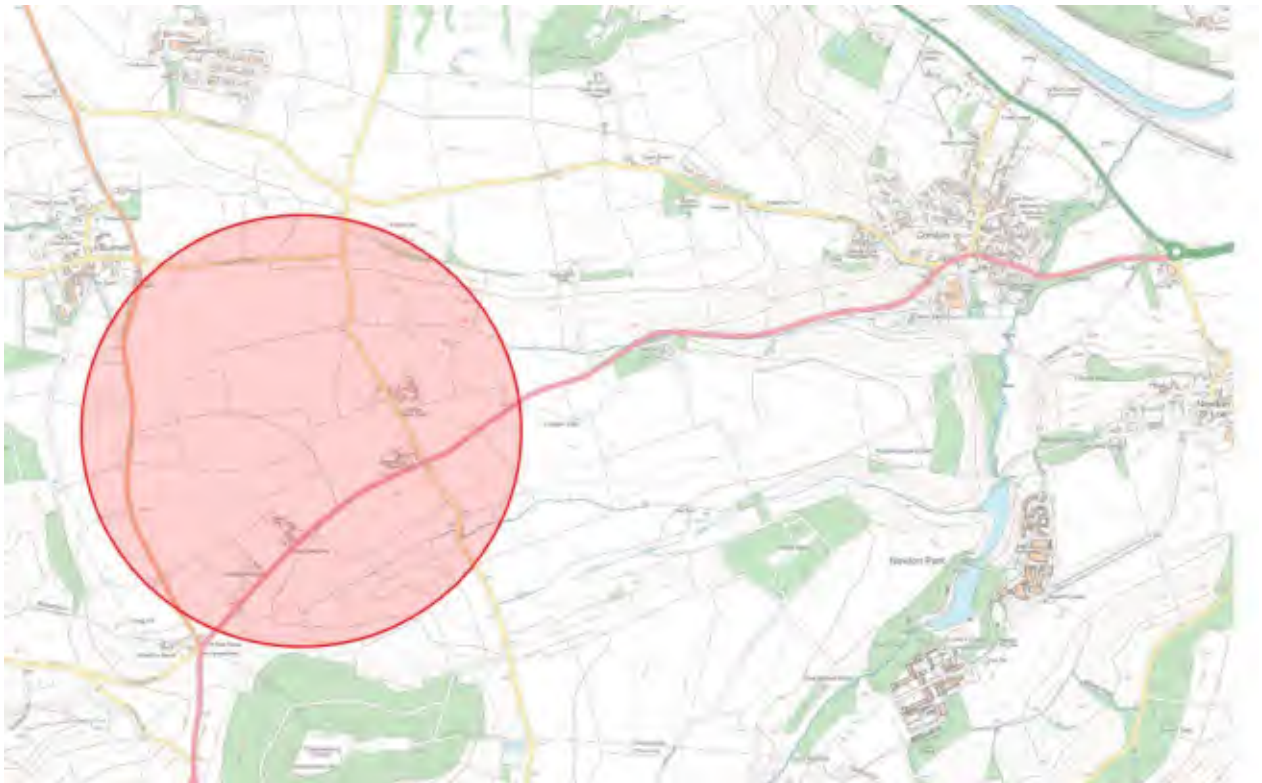


Figure 15 Broad area of search south of Burnett

- 5.101 As it is some distance away from any reasonably sized communities, it would need to be of sufficient scale to provide day-to-day services such as a primary school and local shops. It would also be reliant on improvements to public transport and active travel routes, which if delivered, would also benefit other existing communities along this route and in the wider area. Considerable further work is required to identify whether these issues are achievable.
- 5.102 One of the potential benefits of this location is that a significant portion of this area is owned by the Duchy, who have a proven track record of delivering high quality, sustainable and mixed use development. An additional benefit of this location is that given its proximity to the Bath Spa University campus, there could be opportunities to deliver some of their future needs in this location. This has not been discussed with Bath Spa University.
- 5.103 Views of stakeholders are sought as to whether this location should be explored as a potential, longer term development opportunity.

Do you think we should explore the potential for longer-term development in this location? Please explain your reasons.

South of Burnett

<p>Opportunities</p>	<p>The area provides a potential opportunity for a small new settlement/community and employment.</p> <p>It lies relatively close to Bath on the A39 bus corridor that could potentially be improved.</p> <p>It could contribute to the longer term growth strategy for B&NES.</p>
<p>Constraints</p>	<p>Currently poor connectivity to the A4/Bristol-Bath strategic corridor as the main public transport corridor which is the current focus for investment.</p> <p>Stantonbury Hill and its setting - scheduled ancient monument.</p> <p>The area lies within the Green Belt.</p> <p>There are some existing hedgerows and plantations within the area which should be protected.</p> <p>A high-pressure gas pipeline cuts across the area.</p> <p>A 33kV overhead powerline cuts across part of the area.</p> <p>The area is separated from existing towns and facilities</p>
<p>Mitigation required</p>	<p>Woodland screening to the west to mitigate impacts on the Chew Valley.</p> <p>An appropriate response to the setting of Stantonbury Hill.</p>
<p>Further evidence required</p>	<p>Heritage assessment of the potential impacts on Stantonbury Hill and its setting.</p> <p>This location may raise issues under HRA and SAC bat surveys may be required</p>

6 Bath to Bristol corridor and south east edge of Bristol

Strategy Overview and Key Issues

6.1 The area described in this Options Document as the Bath to Bristol corridor and the south east edge of Bristol comprises areas located along or close to the Bath to Bristol A4 corridor, and areas adjoining the south east edge of Bristol including:

- Keynsham and Saltford
- Hicks Gate
- Whitchurch Village

6.2 These areas have been selected for review in terms of potential growth due to their relative sustainability in relation to access to sustainable transport modes and access to services and facilities, when compared to other areas of the district.

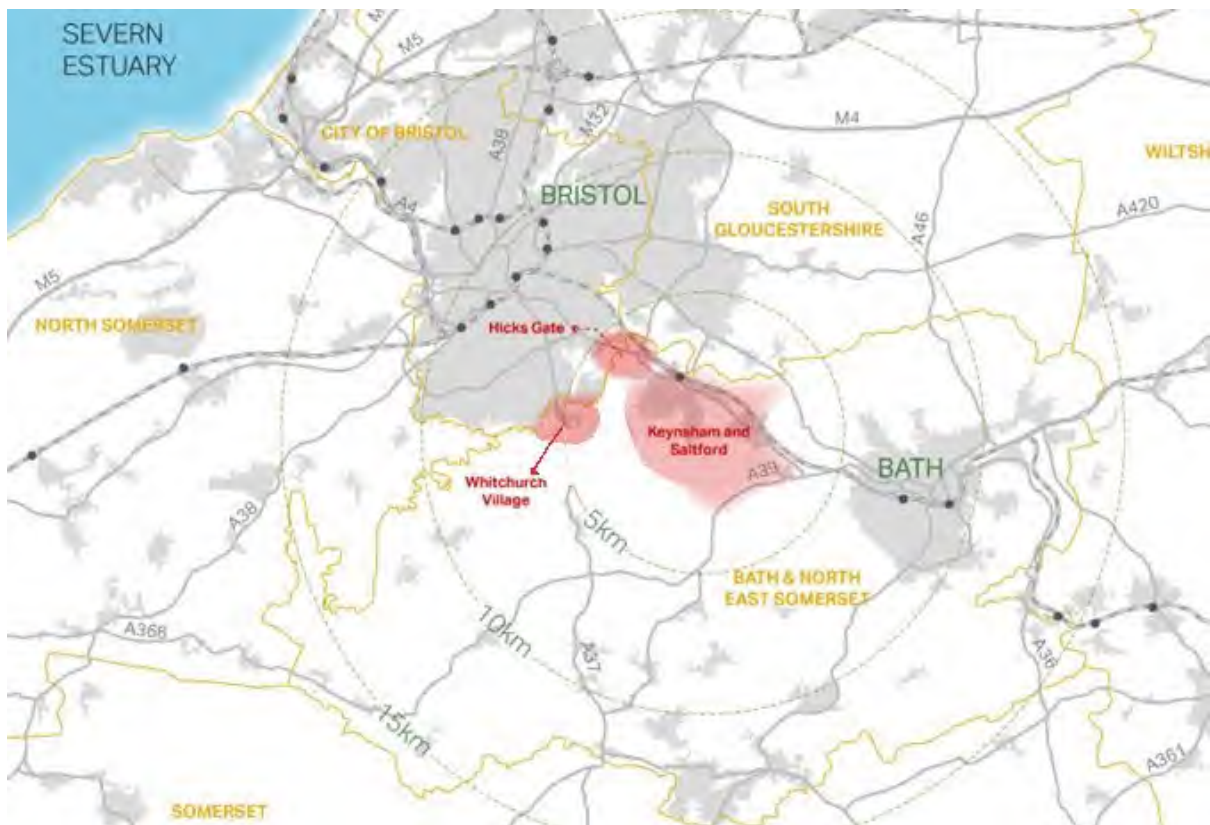


Figure 16: Map showing location of area described as Bath to Bristol corridor and south east edge of Bristol

Duty to co-operate

- 6.3 Bristol City Council and South Gloucestershire Council administrative areas are located directly to the north and east of the Bath to Bristol corridor. Therefore, meetings with both of these authorities have been undertaken and will continue to take place to discuss strategic cross-boundary matters such as transport, flood risk, green belt, and housing provision.

Transport

- 6.4 The Bath to Bristol A4 corridor provides a strategic transport link with frequent bus services between the two cities. The West of England Combined Authority (WECA) have recently consulted on initial options for upgrades to the A4 Bath to Bristol corridor, which set out a range of proposed improvements for active travel modes and bus services. Amongst others, the proposed improvements would provide continuous and designated walking and cycling routes along the A4, shared between the two active travel modes in locations where space is limited, continuous designated bus lanes on both sides of the bypass for much of the corridor, and mobility hubs located along the corridor providing facilities to easily transfer between different modes of transport. A new cycling and walking route is also proposed along Station Road in Keynsham, providing good connectivity between the A4, Keynsham Railway Station and Keynsham Town Centre.
- 6.5 Regular train services exist between Bath Spa and Bristol Temple Meads railway stations, with regular services also stopping at Keynsham Railway Station.
- 6.6 The Bristol and Bath Cycle Path (Route 4) links east Bristol with Bath, passing closely to the north of Keynsham and east Saltford. Although some local cycle routes connect into Route 4, there are opportunities to better utilise the proximity of these settlements to the route through provision of additional and dedicated cycle paths.
- 6.7 Whitchurch Village is located along the A37 corridor to the south-east of Bristol. The A37 facilitates radial movements into Bristol from more rural areas to the south of the city. With regards to public transport, there is no railway station in Whitchurch Village, nor at any point along the A37 corridor. However, bus services operate along the A37 corridor, providing relatively good connection with Bristol City Centre to the north, and destinations in the Somer Valley to the south.
- 6.8 Sustrans National Cycle Network (NCN) Route 3 links central and south Bristol to the Chew Valley and Wells, passing through Whitchurch Village, along Staunton Lane and Sleep Lane.

Green Belt

- 6.9 The majority of the district located along the Bath to Bristol A4 corridor, and at the south east edge of Bristol is located within the Bristol and Bath Green Belt.
- 6.10 Delivering future growth along the A4 corridor and to the south east of Bristol would require significant areas of land to be removed from the Green Belt. The impact of removing these parcels of land will need to be carefully considered on an individual basis, but also cumulatively across the whole area.
- 6.11 WECA have published the [Strategic Green Belt Assessment](#) undertaken to inform the now halted SDS, and this document has been used as a starting point to understand the contribution that parcels across the area make to the five purposes of the green belt set out in the NPPF. Following this Options consultation, further assessment will be carried out in relation to the impact of removing preferred site allocations from the Green Belt, and will also consider opportunities for enhancing land retained in the Green Belt.

Green Infrastructure

- 6.12 Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. Opportunities to enhance and extend the Green Infrastructure network should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.
- 6.13 Some of the site options set out in this chapter include reference to ‘Strategic Green Infrastructure Opportunities’, which are located outside of the area shown for potential development. These indicate areas where the Council consider that green infrastructure could be provided or improved to meet Natural England Green Infrastructure standards, and may also offer nature based solutions to address issues such as flooding and nature recovery. New and enhanced green infrastructure will either be funded by development in the area, or through other mechanisms to be explored as we prepare the Draft Local Plan.

Flood Risk

- 6.14 The River Avon flows between Bristol and Bath, in parallel with the A4 corridor. Areas of flood risk exist along parts of the River Avon, and Bristol City Council are currently preparing a Bristol Avon Flood Strategy, to consider potential areas of mitigation required along the river.

- 6.15 B&NES Council and Bristol City Council are in regular correspondence to discuss any impact that flood defence works in the Bristol area might have cross-boundary in B&NES, particularly in the north Keynsham area.
- 6.16 There may also be scope across the whole river catchment for areas of flood risk to be considered for nature-based solutions, and to explore key areas where retrofitting of SUDs could be beneficial.

Keynsham and Saltford

Place Profile

- 6.17 Keynsham and Saltford are settlements which occupy strategic locations on the A4 between Bath and Bristol. Both settlements are linked to the two cities by the A4, and Keynsham is also linked by railway. Sustrans National Cycle Network (NCN) Route 4 links east Bristol with Bath, passing closely to the north of Keynsham and east of Saltford.
- 6.18 Keynsham is a thriving market town, with a population of around 20,000 people. It plays an important role in supporting sustainable economic growth across B&NES, with its absolute employment numbers having increased over the period 2011 – 2021. Its town centre is characterised by variety of local independent retailers, many of which have evolved and set up on the High Street in more recent years, as well as a strong food and beverage offer.
- 6.19 Keynsham's settlement origins are demonstrated by the location of its historic core and Conservation Area fronting onto and within the River Chew Valley. Heritage assets are clustered throughout the Conservation Area in the town centre. During the latter part of the 20th century, Keynsham expanded rapidly to cater for development associated with the growth of Bristol. Expansion eastwards along Wellsway saw settlement growth on either side of the Chew Valley, presenting limitations in settlement connectivity between the east and west sides of the town.
- 6.20 The River Chew provides an important landscape, wildlife and recreational corridor running through the heart of the town, providing potential to connect residents with the wider countryside, particularly through the valley, down to Chew Valley Lake, and beyond. Keynsham sits within the Chew Valley Reconnected Green Infrastructure Project Area, which is made up of important networks of natural and semi-natural habitats, providing crucial habitats and wildlife corridors for priority species.
- 6.21 In Keynsham there is an imbalance of transport modes in the town centre with greater priority given to vehicles over active modes, as is typical of similar size towns. There are a series of walking and cycle routes within Keynsham, however, there are missing links within Keynsham and between Whitchurch Village to the west and Saltford to the east. Keynsham has its own rail station and there is a good frequency of bus services operating from Keynsham town centre offering services to destinations including the centres of Bath and Bristol. Services to other destinations not on the main bus routes to Bristol and Bath can be less frequent.

- 6.22 The principal roads that serve Keynsham and Saltford are the A4, A4175, B3116 and Charlton Road. The private car mode share for journeys to work are higher than the national and South West average. During the traditional weekday highway peak hours, there is congestion typically along the A4 and within Keynsham town centre on roads such as Bath Hill, Station Road and Mill Lane.
- 6.23 Saltford is a large village located to the east of Keynsham, with a population of around 4,000 people. Its historic core and Conservation Area front the River Avon to the north of the village, with numerous heritage assets located within this area. Over time, the village has grown to the south and west, with development predominantly residential in use, but with a small quantity of retail and commercial businesses located along the A4. Other village facilities such as the village hall and recreation ground are located to the north of the village, and Saltford Primary School is located off Claverton Road towards the south of the village.
- 6.24 Keynsham and Saltford are surrounded by the Bristol and Bath Green Belt, which separates the two settlements.
- 6.25 The Cotswold National Landscape is located directly to the east of Saltford, with impressive sweeping views across the two settlements visible from across the designated area.
- 6.26 A local designation in the adopted Local Plan relating to the Landscape Setting of Settlements wraps around much of Keynsham and to the north, east, and south of Saltford. The designation as shown on the Policies Map and associated policy requires that development should only take place if it conserves and enhances this landscape setting. We are seeking comments on the extent of the existing designation. Later in this document there is an opportunity to identify whether the boundaries of any existing landscape settings of settlements identified on the Policies Map should be amended. A link to the policies map showing the existing boundaries can be viewed [here](#).

Key Issues and Opportunities

- Evidence from the Employment Needs Assessment and Office and Industrial Market Review suggests net employment land requirements over the Plan period in the Keynsham area comprise around:
 - 11,000 sqm office space (1 ha land requirement)
 - 7,000 – 9,000 sqm industrial floorspace (2 ha land requirement)
 - 19,000 sqm warehousing / logistics floorspace (4 ha land requirement)

Some of this employment land requirement can be provided through existing commitments i.e. sites with planning permission or allocated in the adopted Local Plan for employment development. These existing commitments will need to be reviewed in preparing the Draft Local Plan.

- Land surrounding Keynsham and Saltford is designated as Green Belt. Any new development adjoining the settlements would require the removal of land from the Green Belt, and removal would require exceptional circumstances to be fully evidenced and justified.
- Flood risk from the River Avon to the north of Keynsham and to the east of Saltford restricts potential development in these areas.
- The Bath to Bristol Strategic A4 corridor experiences significant congestion in both directions during peak times, including through the centre of Saltford. Congestion on the A4 also causes delays in Keynsham town centre.
- Insufficient public transport provision and easy and cheap parking within Keynsham results in an over-dependence on travelling by car within Keynsham and Saltford. Currently no public transport options exist between the two settlements, though WECA has recently consulted on works to the A4, which includes bus stops and mobility hubs along the A4 providing links between the two settlements.
- Keynsham's car parks are reasonably well utilised with a peak occupancy of 75%. However, this is over a relatively short time period with a 7-day mean occupancy of 55%, indicating a surplus of car parking in the town.
- Public space is more balanced towards vehicles over people, causing issues with congestion and severance.
- Keynsham and Saltford both have Air Quality Management Areas (AQMAs) where air pollution levels exceed the governments' objective limit.
- Poor connectivity to the Bristol to Bath cycle route from both Keynsham and Saltford, and cycle routes within the settlements are also poorly connected
- Poor access to Keynsham Railway Station on foot, bicycle, and bus, particularly from the A4 corridor.

- Both settlements are located in areas of landscape sensitivity. The Cotswolds National Landscape is located directly east of Saltford, with views across both of the settlements, and a local designation relating to the Landscape Setting of Settlements wraps around much of Keynsham and to the north, east, and south of Saltford.
- Keynsham is bisected by the River Chew, which provides an important landscape, wildlife and recreational corridor through the town, but also creates movement severance for people due to limited crossings over the river. Weirs along the river currently provide barriers to fish passage for migratory fish.
- Keynsham and Saltford contain numerous important heritage assets which require protection.
- Keynsham lacks a cultural space/venue such as a hall with theatre for use by community.
- Keynsham and Saltford have health and wellbeing needs that the built and natural environment can play a role in addressing, including food insecurity, cardiovascular, respiratory and healthy weight needs.

Priorities and Objectives

6.27 The following list sets out the key priorities and objectives for Keynsham and Saltford. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Create opportunities to enable Keynsham to attract new employers, including in established and emerging sectors, and generate a range of jobs that will mean local residents have access to and can thrive in good work, by providing land to meet employment requirements of the area.
- Provide homes to meet the needs of the district, including provision of homes that are affordable, and a mix of homes to meet the need of a variety of demographics, including homes for older people.
- Retain significant green gap between Keynsham and Saltford, and seek to improve the quality of the gap, making it more accessible and useable to all.
- Create opportunities to become carbon neutral and nature positive by 2030, and work towards a climate resilient district.

- Ensure provision of community and social infrastructure and sustainable transport initiatives that serve existing residents as well as new, and across the lifecycle.
- Improve accessibility and connectivity by sustainable modes within Keynsham and Salford, and also between the two settlements.
- Explore options to alleviate congestion within Keynsham Town Centre, and along the A4 corridor at peak times.
- Protect the key aspects of the landscape setting of the two settlements, and views to and from the Cotswold National Landscape.
- Provision of good quality green and blue infrastructure that is accessible and usable to all, placing nature at the heart of any development opportunities.
- Maximise ecological mitigation and biodiversity net gain.
- Restore the natural connectivity and functioning of the river and flood plain for key species.
- Enhance access to the river for leisure, and explore potential to provide more space for boat dwellings.
- Explore the green infrastructure opportunities provided by the River Chew Valley through Keynsham, the River Avon corridor, and Stockwood Vale, for nature recovery, human health and well-being, and climate adaptation and mitigation.
- Seek opportunities to encourage community food growing and edible landscapes, and provide space for allotments.
- Ensure policy supports the delivery of built and natural environments that promote health and wellbeing for all.

Do you support this approach?

Transport Opportunities

6.28 Some of the key issues in Keynsham and Saltford relate to transport and highways, as listed above. A number of transport opportunities and potential interventions have been identified for Keynsham and Saltford. These interventions will need more detailed consideration whilst preparing the Draft Local Plan, including mechanisms for funding them.

- Active Travel Mode Routes - New segregated cycle lanes, as well as changes to country lanes where appropriate, providing a clear network of attractive primary and secondary routes connecting key amenities and facilities. This could include improvements for active travel between Keynsham and Saltford; and improved routes between Whitchurch and Keynsham, including to Broadlands Academy.
- Modal filters - Targeted filters as part of Liveable Neighbourhoods style interventions to link residential areas with local centres and town centre.
- E-Bikes and E-scooters - Support the expansion of the e-scooter and e-bike rental schemes into Keynsham and Saltford to improve local mobility, including provision of E-bike hire stations within both settlements.
- Public Realm - Measures to keep traffic on appropriate routes, away from less appropriate and more sensitive areas, providing opportunities to deliver sustainable transport and public realm benefits.
- Public Realm - Re-allocate private vehicle space to people over cars. E.g. widened footways, improved crossings, footway crossovers, public space.
- Public Realm - Enhance public realm in the town centre, creating a more attractive local environment.
- Mobility Hubs – Provision of new mobility hubs on the A4, within Keynsham town centre and in proximity to Keynsham rail station. Provision of additional mobility facilities at existing car parks.
- Bus Priority – Interventions to provide bus journey time benefits, by prioritising buses over private vehicles.
- Demand Responsive Transport (DRT) - DRT could be used to connect to proposed mobility hubs within Keynsham town centre, where passengers can gain access to a connecting bus or rail service to complete their journey.

Do you support this approach?

Site Options

- 6.29 A variety of site options for development are set out below, which have been prepared in response to the key issues, priorities and objectives set out above. Explanation as to how each of the site options responds to the key issues, priorities and objectives is set out within the opportunities and constraints tables for each site option. Where mitigation or additional evidence work is required to achieve priorities and objectives, this is referenced within the table. Conflicts with priorities and objectives are also referenced.
- 6.30 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the Housing and Economic Land Availability Assessment (HELAA), the Sustainability Appraisal (SA), the Keynsham and Saltford Area of Search Assessment, and the Strategic Planning Options Document (SPO). The table below sets out the HELAA and SA references relevant to each site option.
- 6.31 Within these documents, a number of additional sites have also been assessed, and discounted, for various reasons. These sites are not included in the site options below, for the reasons set out in the evidence base. However, this Options Document consultation provides an opportunity for stakeholders and communities to provide comments on these discounted sites, by answering the question: Are there any other sites that haven't been identified, that need to be considered?
- 6.32 The Council is also considering whether the potential for a new settlement to the south of Burnett, adjacent to the A39, should be explored. This potential opportunity that could provide housing, employment space, and other uses, towards the end of or beyond the Local Plan period, is being consulted on through this Options document (see Bath and Environs chapter for more information).

Local Plan Site Option	HELAA	SA
North Keynsham	K12, K13, K29Z, K30	K5
East of Avon Mill Lane	-	-
Central Keynsham 1	-	'Other sites'
Central Keynsham 2	-	'Other sites'
West Keynsham 1	K15a, K15b, K15c	K2 and K3
West Keynsham 2	K15c	K2 and K3
South East Keynsham	K21, K22, K23	K1
West Saltford	SAL27b, SAL28	S6
South Saltford	SAL01, SAL01a, SAL02	S7

6.33 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define site specific interventions required.

Are there any other sites that haven't been identified, that need to be considered?

North Keynsham

Context

- 6.34 North Keynsham is located to the east of Keynsham town centre, and south of the River Avon, separated from the town by the railway line running between Bristol and Bath. Narrow access points via various bridges and tunnels connect the site to Keynsham.
- 6.35 The site is located in close proximity to the A4, the Bristol and Bath Cycle Path and Keynsham Train Station, all of which provide direct access to Bath and Bristol by bus, train and bicycle.
- 6.36 Some constraints exist across the site due to its location, existing land uses, and poor connections to its surroundings (see constraints in table below). However, through careful masterplanning and provision of mitigation where required, the site is considered to be a good option for development due to its highly sustainable location.
- 6.37 Due to its highly sustainable location, if this area is allocated for development in the Local Plan, its deliverable capacity should be optimised. With this in mind, further evidence base work is being undertaken to determine whether a higher quantum of development than set out below could be provided through mitigation of on-site constraints imposed by the water recycling plant and gas pipeline.
- 6.38 Additional landscape evidence work is also being undertaken to assess the impact of development on the Cotswold National Landscape and its setting.
- 6.39 The option for potential development at West Salford, will need to be considered in conjunction with this North Keynsham option, with regards to maintaining a significant green gap between Keynsham and Salford, which is a key priority for both settlements.
- 6.40 A road will be required to access the development site and it is envisaged that it will also play a more strategic role as a relief route , pulling traffic out of Keynsham town centre, to the wider benefit of the town and enabling a greater focus on sustainable modes of transport on the town centre area network.
- 6.41 The site requires provision of significant infrastructure, not only from a transport perspective, but also to provide services and facilities for future residents. Optimising residential development at the site is considered to be important to both financially support provision of this infrastructure, and secure its long term use.

6.42 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses this land parcel (P72) as having the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Limited / no contribution
- Purpose 2 - preventing the merger of neighbouring towns: Significant contribution
- Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
- Purpose 4 - preserving the setting and special character of historic towns: Moderate contribution

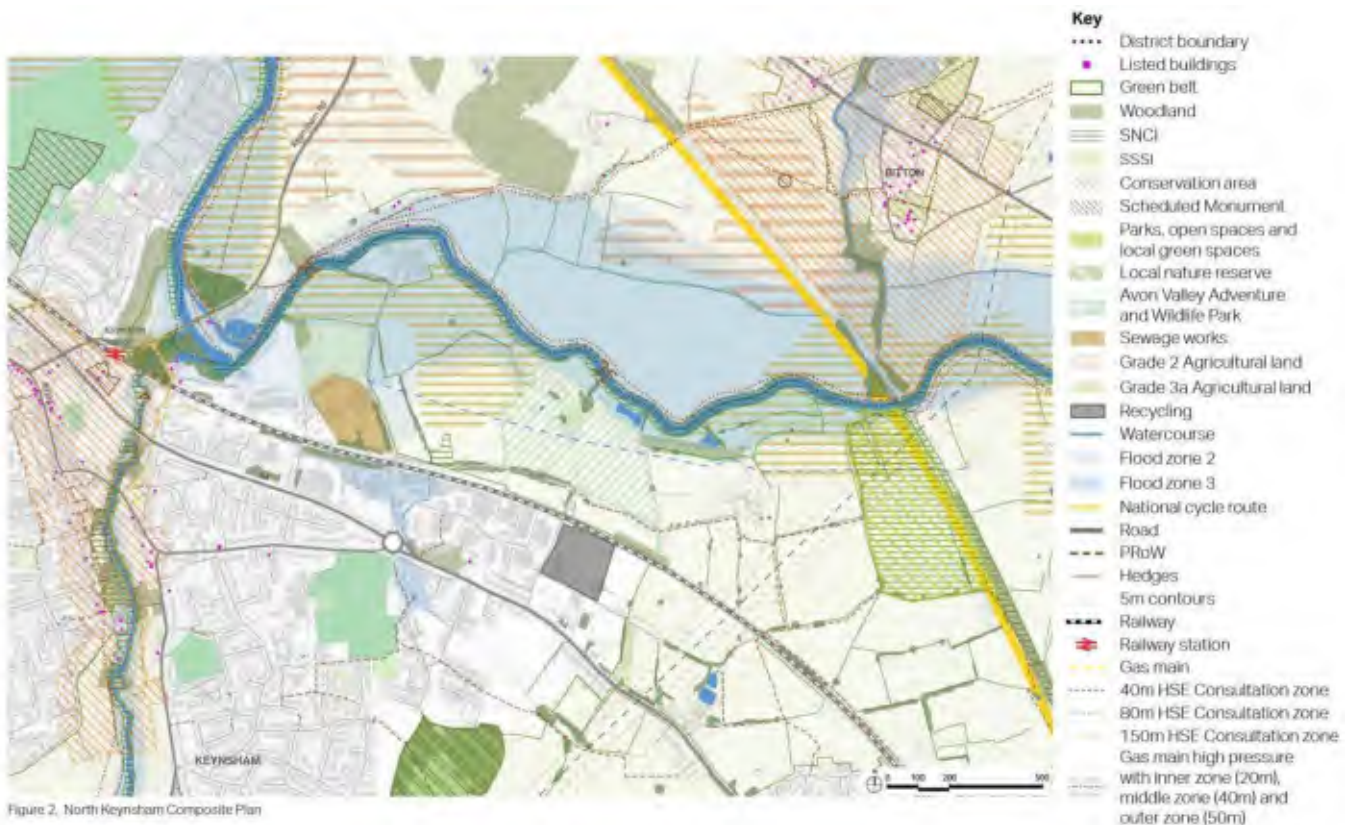


Figure 17: Context Plan - North Keynsham

Site Option

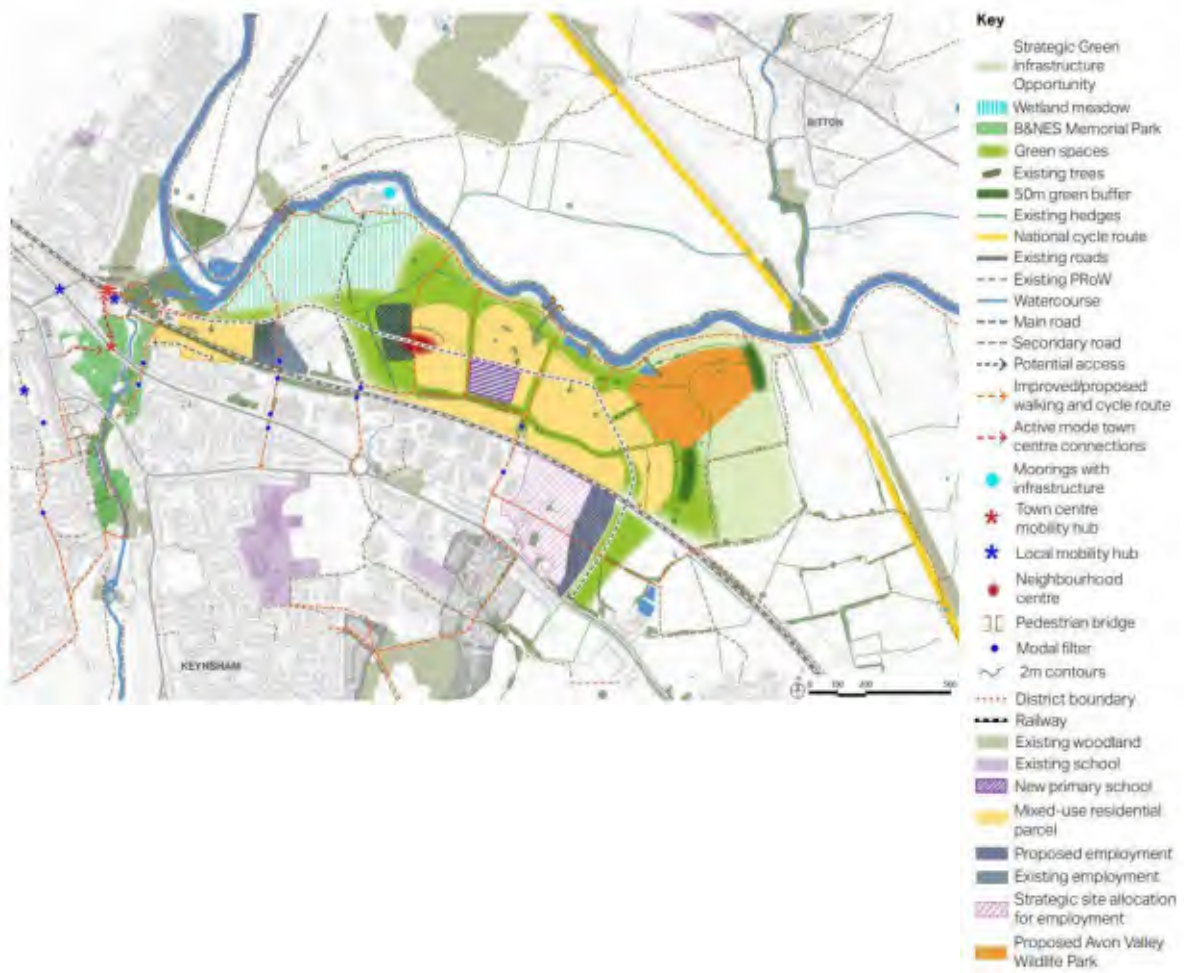


Figure 18: Indicative concept plan - North Keynsham

North Keynsham	Description
<p>Opportunities</p>	<p>Provision of a sustainably located mixed-use development, comprising:</p> <ul style="list-style-type: none"> • Around 1,500 new homes, with potential to include an element of Purpose Built Student Accommodation within the wider mix of housing • Around 6.5 ha of employment uses <p>A range of community and leisure facilities at the centre of the development, including a primary school, retail provision, community facilities, and the opportunity to provide a cultural facility, such as a hall with theatre, for use by local communities. Located in close proximity to the A4, the Bristol and Bath Cycle Path and Keynsham Train Station, providing direct access to Bath and Bristol by public transport and active travel modes. Potential to provide high quality active travel routes into town centre and also to Bristol to Bath cycle route. Opportunity to provide car free development due to sustainable location.</p> <p>Potential to provide a strategic link on the highway network using the access road required by the site to remove traffic from Keynsham town centre, to the wider benefit of the town.</p> <p>Potential to explore the use of the river front for moorings and other water-related uses.</p> <p>Significant opportunities for nature recovery and wetland habitat within areas located in flood zone 3.</p> <p>Potential to explore the creation of woodland habitats linking Keynsham community woodland to the River Avon.</p>

<p>Constraints</p>	<p>Located in the Green Belt.</p> <p>Potential for loss of green gap between Keynsham and Saltford, particularly when considered in addition to option at West Saltford.</p> <p>Significant landscape sensitivity considerations relating to the impact of development on the Cotswold National Landscape. The relocation of Avon Valley Wildlife Park to the east will also need to be considered in relation to potential landscape impact on the Cotswolds National Landscape and its setting.</p> <p>Stidham Farm SSSI and SNCI located to the east of the site. Broadmead Field SNCI and River Avon SNCI located within the site boundary.</p> <p>Access is currently restricted due to the site's location between the railway line and the River Avon. Narrow access points exist via bridges and tunnels connecting the site to Keynsham. Poor access to the site exists from Keynsham Train Station.</p> <p>The north-western side of the site is located in flood zone 3. Part of the site is also located in Flood Zone 2.</p> <p>Relocation of Avon Valley Wildlife Park required. Odour zone from water recycling centre restricts some land uses in its immediate surroundings.</p> <p>High-pressure gas main running along the eastern side of the site restricts most land uses within HSE explosive standoff areas.</p>
<p>Mitigation required</p>	<p>Requires significant improvement to walking and cycling routes between the site, Keynsham Train Station and the wider town.</p> <p>Significant green infrastructure buffer likely to be required to the east of any development, to reduce impact on the Cotswold National Landscape, as well as interspersing significant tree planting and green space within development to help soften and break up any perceived mass of built forms, strengthen green infrastructure, and enhance the integration of built form within the landscape.</p> <p>Ecological mitigation required to ensure safeguarding of SSSI and SNCI, and to deliver fish recovery</p>

<p>Further evidence required</p>	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Landscape assessment required to assess impact of development on Cotswold National Landscape.</p> <p>Evidence to consider whether mitigation at water recycling centre could allow for development closer to the works.</p> <p>Evidence to consider whether mitigation along gas pipeline could allow for development within HSE explosive standoff areas.</p>
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Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Do you have any evidence or documentation that you would like to upload, to support your answer?

East of Avon Mill Lane

Context

- 6.43 East of Avon Mill Lane is a narrow parcel of land located to the south of the railway line, accessed via Avon Mill Lane and Vandyck Avenue. It currently accommodates a number of medium sized industrial employment units.
- 6.44 The site is bordered directly to the south by residential homes. The close proximity of the existing industrial units to the residential dwellings currently causes localised issues relating to noise and pollution. This option therefore explores the potential to redevelop the industrial uses for residential, in order to improve the well-being of residents living to the south.
- 6.45 It should be noted that no discussion has taken place with the landowner or existing business occupying the site.



Figure 19: Context plan - East of Avon Mill Lane

Site Option



Figure 20: Indicative concept plan - East of Avon Mill Lane

East of Avon Mill Lane	Description
<p>Opportunities</p>	<p>Provision of around 160 homes, plus a playground for use by existing and new residents, on brownfield site.</p> <p>Opportunity to improve the well-being of existing residents living directly south of the existing industrial units, through replacement with more compatible neighbouring residential use.</p> <p>Potential to explore local food growing opportunities, such as provision of a small orchard.</p> <p>Opportunity to provide car free development in a sustainable location close to Keynsham railway station.</p>
<p>Constraints</p>	<p>Loss of existing industrial employment land.</p> <p>Site located directly adjacent to the railway line.</p> <p>Active travel routes into town centre require improvement.</p>

<p>Mitigation required</p>	<p>Significant planting to the north of the site required to provide a visual and noise buffer to the existing rail lines.</p> <p>Consideration of active travel routes into town centre required.</p>
<p>Further evidence required</p>	<p>Holistic review of employment space across the District required, including the impact of the loss of this industrial site.</p> <p>Contamination assessment required due to current industrial land use.</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Do you have any evidence or documentation that you would like to upload, to support your answer?

Central Keynsham

Context

- 6.46 The Sustainable Transport Plan for Keynsham town centre includes the provision of improved public transport, walking and cycling infrastructure, with the aim to encourage people to use sustainable modes of transport to get to Keynsham town centre. This aims to lead to a reduction in the need for car parking spaces in the centre of the town, over the 20-year Plan period.
- 6.47 As such, and depending on further analysis of car parking provision within the town centre, the options below explore the potential to redevelop some of the existing car parks close to Keynsham High Street to provide mixed-use, residential-led development.
- 6.48 The sites are located in highly sustainable locations, within easy walking distance of the facilities and amenities of Keynsham's main commercial and retail centre, and with excellent access to key public transport links.
- 6.49 Ashton Way Car Park and Labbott North and South car parks are located just behind Keynsham High Street and Temple Street. Both car parks serve town centre visitors and those working in the town. Option 1 explores the opportunity to redevelop half of Ashton Way car park (retaining the other half as car parking), and both of the Labbott car parks, to provide residential apartments.
- 6.50 Tesco supermarket is located on Danes Lane. The shop sits to the rear of the plot, with a large car park to the front of the building.
- 6.51 Both option 1 and 2 explore the potential to redevelop the site, moving Tesco to the front of the plot to provide an improved supermarket and create an active frontage to Danes Lane, and optimising the use of the site through provision of residential uses above the retail unit. Option 2 also considers a potential reduction in the size of the car park (or consideration of multi-storey elements), with provision of a block of apartments on part of the site. The likely embodied carbon impact of such redevelopment needs further assessment (see also embodied carbon policy options in Chapter 9: Development Management Policies). Further, it should be noted that no discussion has taken place with Tesco regarding these options.



Figure 21: Context plan - Central Keynsham

Site Options

Central Keynsham Option 1



Figure 22: Indicative concept plan - Central Keynsham Option 1

Central Keynsham Option 1	Description
Opportunities	<p>Provision of around 100 homes.</p> <p>Optimise development on brownfield land, located in highly sustainable town centre location.</p> <p>Creates active frontage on Danes Lane.</p> <p>Opportunity to explore urban greening through planting of street trees and provision of green infrastructure.</p>
Constraints	<p>Requires redevelopment of car parking spaces in town centre location - dependant on further analysis of car parking provision within the town centre over 20 year Plan period.</p> <p>Requires relocation of Tesco to eastern side of plot.</p> <p>Embodied carbon considerations relating to redevelopment of existing building.</p> <p>Located adjacent to Keynsham Conservation Area, and multiple listed buildings.</p> <p>Constrained brownfield sites with little opportunity for green space provision.</p>
Mitigation required	<p>Linked to sustainable transport plan for the town, which seeks to improve infrastructure to encourage active and sustainable modes of travel, therefore reducing the need for car parking spaces in the town centre.</p>
Further evidence required	<p>Further analysis of car parking use in Keynsham Town Centre.</p> <p>Embodied carbon analysis relating to redevelopment of existing building.</p>

Central Keynsham Option 2

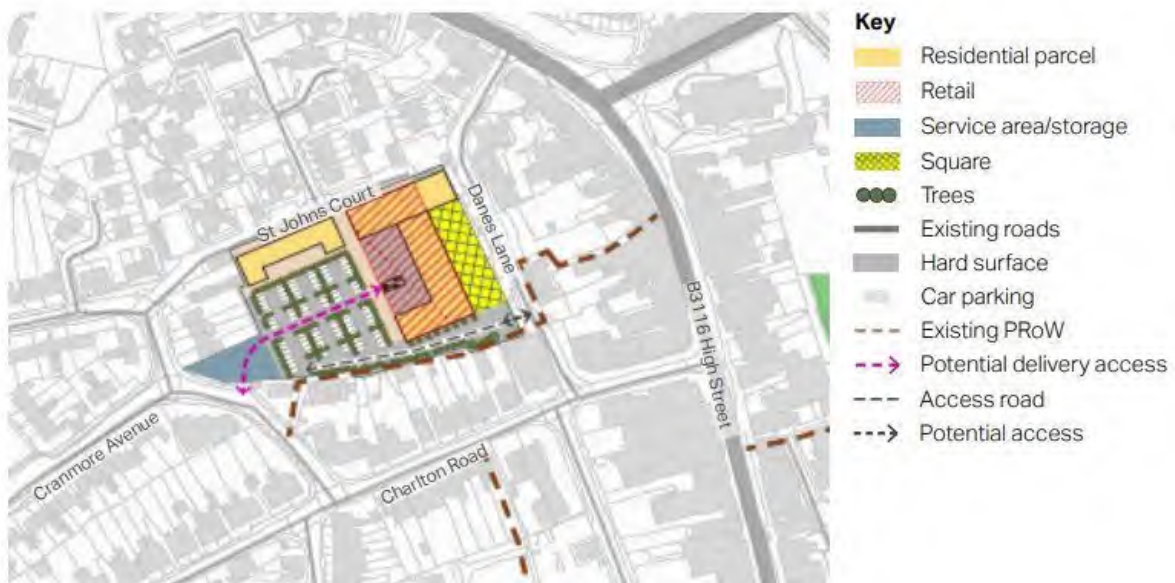


Figure 23: Indicative concept plan - Central Keynsham Option 2

Central Keynsham Option 2	Description
<p>Opportunities</p>	<p>Provision of around 40 homes.</p> <p>Optimises development on brownfield land, located in highly sustainable town centre location</p> <p>Create an active frontage onto Danes Lane, including public square to provide amenity green space to residents.</p> <p>Opportunity to explore urban greening through planting of street trees and provision of green infrastructure.</p>
<p>Constraints</p>	<p>Requires relocation of Tesco to eastern side of plot.</p> <p>Embodied carbon considerations relating to redevelopment of existing building.</p> <p>Requires small reduction in car parking at Tesco site (though multi-storey elements could be explored).</p>

	<p>Located adjacent to Keynsham Conservation Area, and multiple listed buildings.</p> <p>Constrained brownfield site with little opportunity for green space provision.</p>
Mitigation required	None identified.
Further evidence required	<p>Analysis of Tesco car parking requirements.</p> <p>Embodied carbon analysis relating to redevelopment of existing building.</p>

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

West Keynsham

Context

- 6.52 West Keynsham is located to the west of Charlton Road. The southern end of the site directly fronts Charlton Road, whereas the northern side neighbours the back gardens of the houses on Lays Drive.
- 6.53 The land is mainly used as arable fields with Lays Farm Trading Estate located in the centre. The site is fragmented by well-maintained hedgerows and mature trees creating enclosed areas. To the west of the site, the land slopes steeply towards Stockwood Vale.
- 6.54 Two options for West Keynsham are set out below. The first optimises housing development in this area, but would require the relocation of businesses at Lays Farm Trading Estate. The second reduces the number of homes proposed significantly, retaining Lays Farm Trading Estate in situ.
- 6.55 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses this land parcel (P82) as having the following contribution to each of the NPPF Green Belt purposes:
- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Significant contribution
 - Purpose 2 - preventing the merger of neighbouring towns: Significant contribution
 - Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
 - Purpose 4 - preserving the setting and special character of historic towns: Moderate contribution

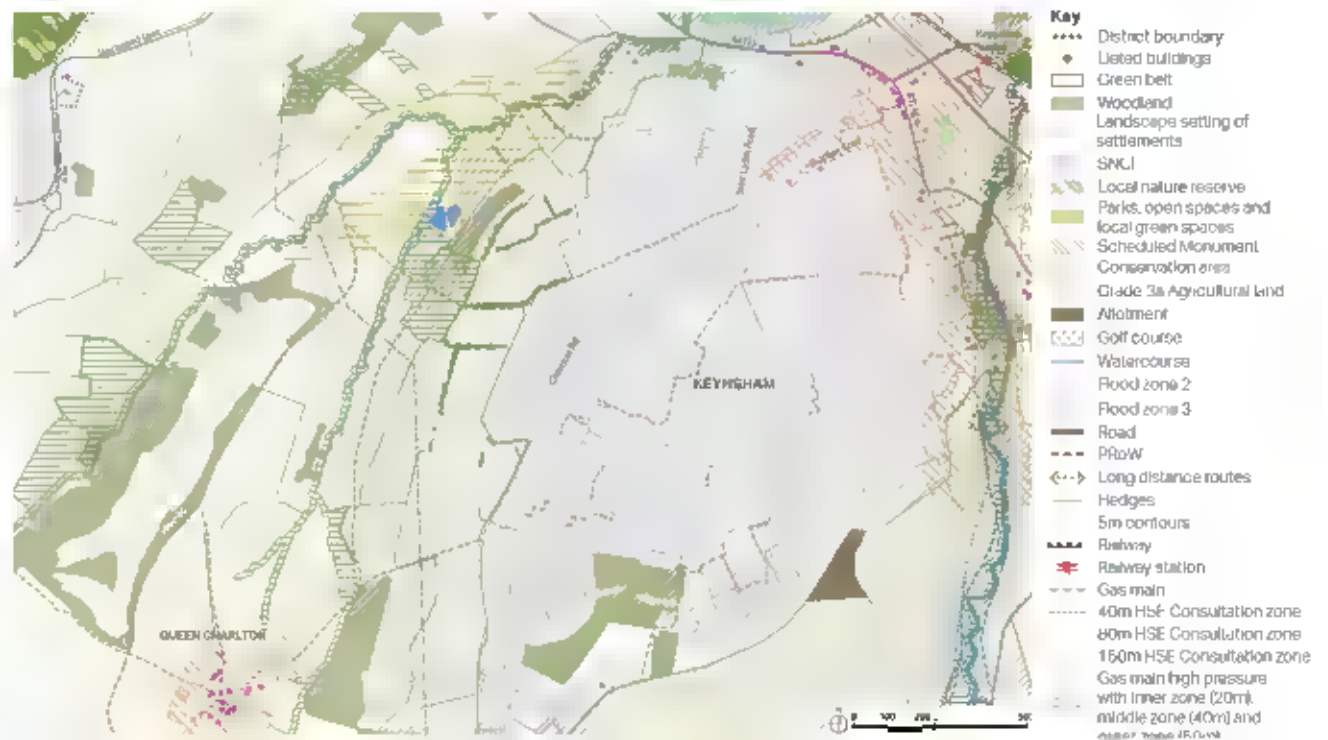


Figure 24: Context plan - West Keynsham

Site Options

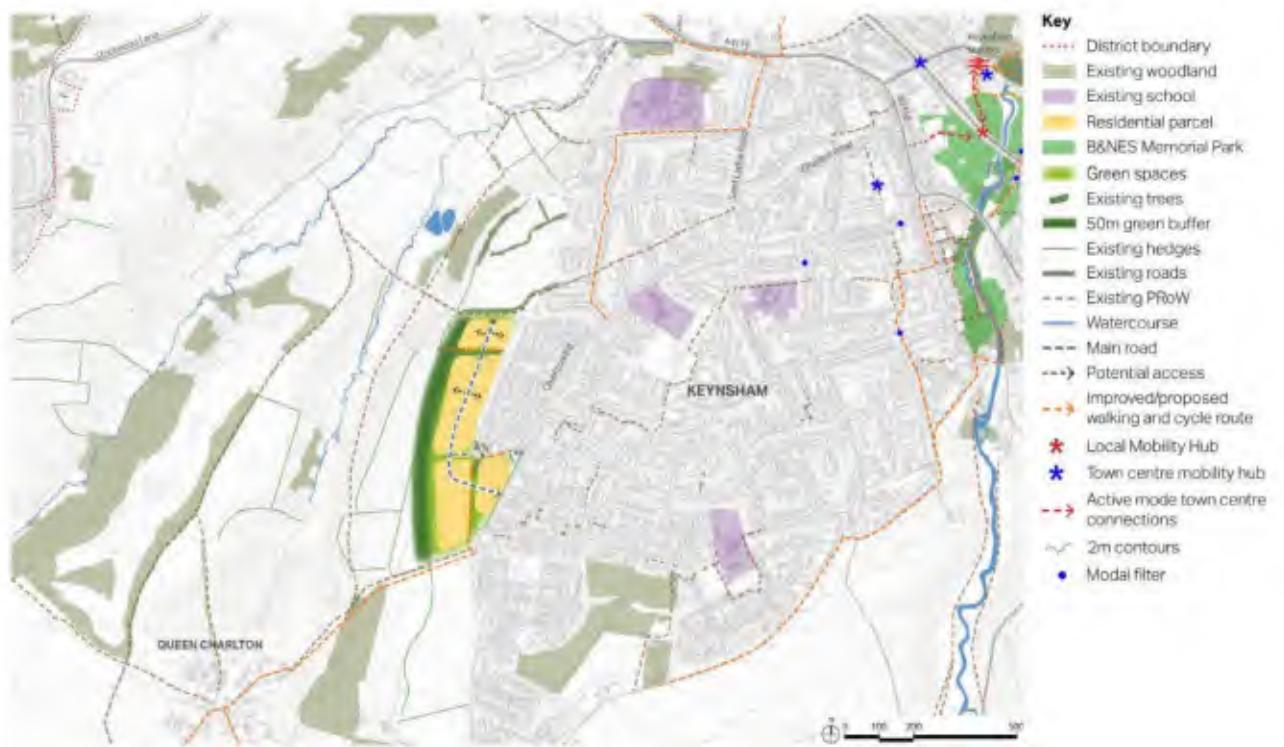


Figure 25: Indicative concept plan - West Keynsham Option 1

West Keynsham Option 1

West Keynsham Option 1	Description
Opportunities	Provision of 300 homes
Constraints	<p>Located in the Green Belt</p> <p>Loss of employment land at Lays Farm Industrial Estate</p> <p>Loss of agricultural land</p> <p>Single vehicular access only from Charlton Road</p> <p>Pedestrian access to the north of the site linking to town centre currently very narrow – improved access required</p> <p>Site lies within area designated as part of the Landscape Setting of Settlement, therefore development must consider conservation and enhancement of landscape character and landscape setting of Keynsham.</p> <p>Much of site covered by SNCI buffer.</p>
Mitigation required	<p>50m minimum GI buffer along western edge of site to mitigate harm to views from west.</p> <p>Tree-lined streets, and tree-line avenue to run north to south at highest point to enhance screening.</p> <p>SNCI to be retained and protected.</p>
Further evidence required	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district, and considering opportunities for enhancements to retained Green Belt land</p> <p>Landscape assessment required to consider impact of development on Landscape Setting of Settlement.</p> <p>Consideration of potential risk to watercourse due to elevated position of site.</p>

West Keynsham Option 2

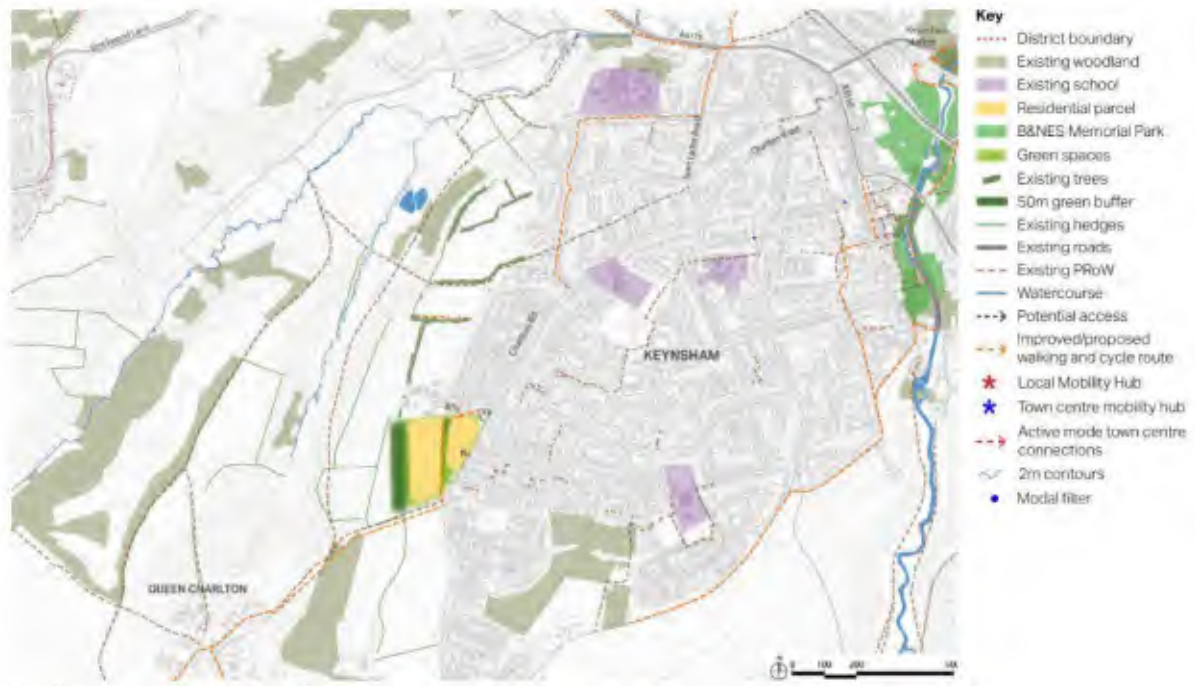


Figure 26: Indicative concept plan - Option 2

West Keynsham Option 2	Description
Opportunities	Provision of 100 homes.
Constraints	<p>Located in the Green Belt</p> <p>Site lies within area designated as Landscape Setting of Settlement, therefore development must consider conservation and enhancement of landscape character and landscape setting of Keynsham.</p> <p>Limited access to green space and local food growing provision. Green space would need to be accommodated on site.</p>
Mitigation required	50m GI buffer along western edge of site to mitigate harm to views from west
Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact

	<p>when considering strategic removal across the district and considering opportunities for enhancements to retained Green Belt land.</p> <p>Landscape assessment required to consider impact of development on Landscape Setting of Settlement.</p> <p>Consideration of potential risk to watercourse due to elevated position of site.</p>
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Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

South East Keynsham

Context

- 6.56 South East Keynsham is located to the south of the east side of Keynsham, comprising two parcels of land located to the east and west of Wellsway (the B3116). Wellsway connects the town to the A39 to the south.
- 6.57 The parcel located to the west of Wellsway is used as arable land and is bounded by residential homes to the south and north, and woodland to the west.
- 6.58 The parcel located to the east of Wellsway is also used as arable land, and extends up to Courtenay Road to the north, to provide a walking and cycling route up into Keynsham, as no permeability exists between the land parcel and the residential development adjoining it to the north.
- 6.59 A bus stop providing a twice hourly bus service into Bristol to the north, and the Somer Valley to the south, is located on Wellsway close to the site. However, improvements to walking infrastructure to reach the bus stops from the site would be required as limited pavement currently exist.
- 6.60 The nearest existing convenience shop is located on Chandag Road, approximately 1 mile away from the site.
- 6.61 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P84 west of Wellsway, and P85 east of Wellsway) as having the following contributions to each of the NPPF Green Belt purposes:
- Purpose 1 - checking the unrestricted sprawl of large built-up areas: P84 and P85 Limited / no contribution
 - Purpose 2 - preventing the merger of neighbouring towns: P84 limited / no contribution, P85 significant contribution
 - Purpose 3 – safeguarding the countryside from encroachment: P84 and P85 significant contribution
 - Purpose 4 - preserving the setting and special character of historic towns: P84 moderate contribution, P85 limited / no contribution



Figure 27: Context plan - South East Keynsham

Site Option



Figure 28: Indicative concept plan - South East Keynsham

South East Keynsham	Description
Opportunities	<p>Provision of around 350 homes.</p> <p>Potential to provide a convenience shop on Wellsway, to serve existing and new residents.</p> <p>Opportunities to link development into Manor Road Community Woodland Improvement Project work, including potential for expansion of the existing woodland to the east of the development parcel (noting potential constraint of gas pipeline in this location).</p> <p>Opportunity for provision of local food growing.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Poor active travel route availability into Keynsham town centre.</p> <p>Significant walking times to nearest convenience shop on Chandag Road, and to Wellsway Primary School.</p> <p>No permeability between the site and the existing housing to the north, with potential impact being the creation of an isolated development, severed from the existing town.</p> <p>Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements.</p>
Mitigation required	<p>Significant improvements to walking and cycling infrastructure required, both into Keynsham and across to Saltford.</p> <p>Significant tree buffer required along eastern boundary of the site, to reduce impact of built development in views from the Cotswold National Landscape.</p> <p>Significant street tree planting required throughout development parcels, to reduce impact of development in views from the Cotswold National Landscape.</p>

Further evidence required	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district and considering opportunities for enhancements to retained Green Belt land.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).</p>
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Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Do you have any evidence or documentation that you would like to upload, to support your answer?

West Saltford

Context

- 6.62 West Saltford is located on the western edge of the village of Salford. The area is mostly flat arable fields with some hedgerows containing hedgerow trees.
- 6.63 The site connects directly onto the A4 corridor, providing good access to frequent bus stops providing services into Bath and Bristol.
- 6.64 A key priority for the Keynsham and Saltford area of the district is to retain a significant green gap between the two settlements. As such, any development located to the west of Saltford will need to be carefully assessed in conjunction with the options at North Keynsham and South East Keynsham, as well as in relation to land already allocated to the east of Keynsham. Development will need to include requirements to strengthen and enhance the remaining green infrastructure between Keynsham and Saltford, seeking to make it more accessible and useable.
- 6.65 The land parcels are located to the west of Grange Road in Saltford. However, no permeability currently exists between Grange Road and the parcels, due to the continuous configuration of dwelling plots along the road. As such, walking and cycling routes into the village would need to be provided from the south side of the site, connecting to Manor Road, and to the north along the A4, though there may be scope, through discussions with local landowners, to provide a walking route through an existing residential plot, to provide a link into the village.
- 6.66 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P85) as making the following contribution to each of the NPPF Green Belt purposes:
- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Limited / no contribution
 - Purpose 2 - preventing the merger of neighbouring towns: significant contribution
 - Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
 - Purpose 4 - preserving the setting and special character of historic towns: Limited / no contribution

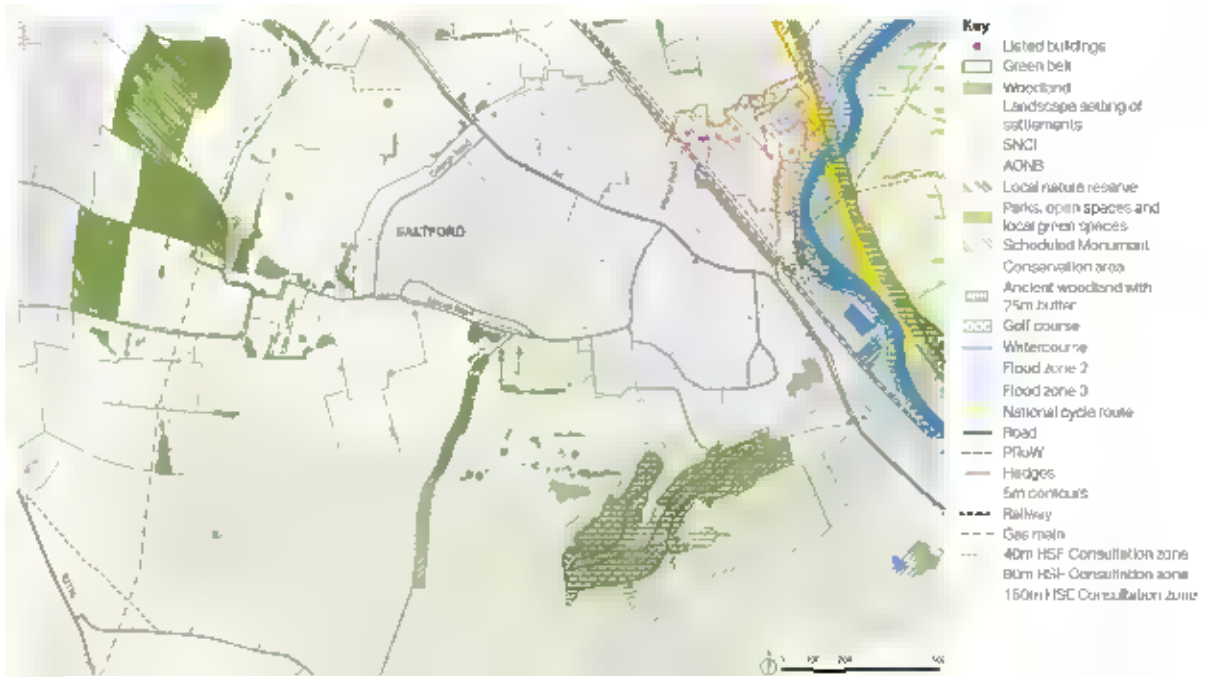


Figure 29: Context plan - West Salford

Site Option



Figure 30: Indicative concept plan - West Salford

West Saltford	Description
<p>Opportunities</p>	<p>Provision of around 500 homes, a new primary school, and a public green space.</p> <p>Opportunity for provision of local food growing.</p> <p>Direct access to A4, providing easy access to sustainable travel options.</p> <p>Opportunity to strengthen and enhance the remaining green infrastructure gap between Keynsham and Saltford, seeking to make it more accessible and useable. Further evidence is required to understand the extent of possible enhancements.</p> <p>Opportunity to explore and fund Manor Road becoming a “Quiet Lane” between Keynsham and Saltford, through introduction of a modal filter, or other traffic restrictions, to ensure traffic flows and speeds are low enough to enable active travel between the two settlements.</p>
<p>Constraints</p>	<p>Located in the Green Belt.</p> <p>Reduces green gap between Saltford and Keynsham, particularly when considered in addition to option at North Keynsham.</p> <p>Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements.</p> <p>Grade II listed Keynsham Manor house located on Manor Road. Impact on setting to be considered, particularly impact of new primary school building.</p> <p>No permeability between site and existing housing to the east on Grange Road. Walking and cycling links would be from the north and south only.</p>
<p>Mitigation required</p>	<p>Strengthening and enhancement of the remaining green infrastructure gap between Keynsham and Saltford required.</p>
<p>Further evidence required</p>	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district, and</p>

	<p>considering opportunities for enhancements to retained Green Belt land.</p> <p>Consideration in conjunction with extent of options at North Keynsham and South East Keynsham, to ensure significant green gap between Keynsham and Saltford remains.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).</p> <p>Discussion with landowners on Grange Road to understand if walking route between plot and village could be created.</p>
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Question: Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Do you have any evidence or documentation that you would like to upload, to support your answer?

South Saltford

Context

- 6.67 South Saltford is located to the south of the village, accessed from Manor Road. The western part of the site is characterised by agricultural fields enclosed by hedgerows with relatively few trees. The eastern part of the site is currently occupied by a golf course with small woodland areas and tree belts between the different parts of the course.
- 6.68 Land parcels at South Saltford would be accessed from Manor Road via two junctions.
- 6.69 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P85) as making the following contribution to each of the NPPF Green Belt purposes:
- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Limited / no contribution
 - Purpose 2 - preventing the merger of neighbouring towns: significant contribution
 - Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
 - Purpose 4 - preserving the setting and special character of historic towns: Limited / no contribution
- 6.70 A locally defined landscape setting of settlement designation is located directly to the south of the South Saltford site option. At page [309](#) there is an opportunity to comment whether the boundaries of any existing landscape settings identified on the policies map should be amended.

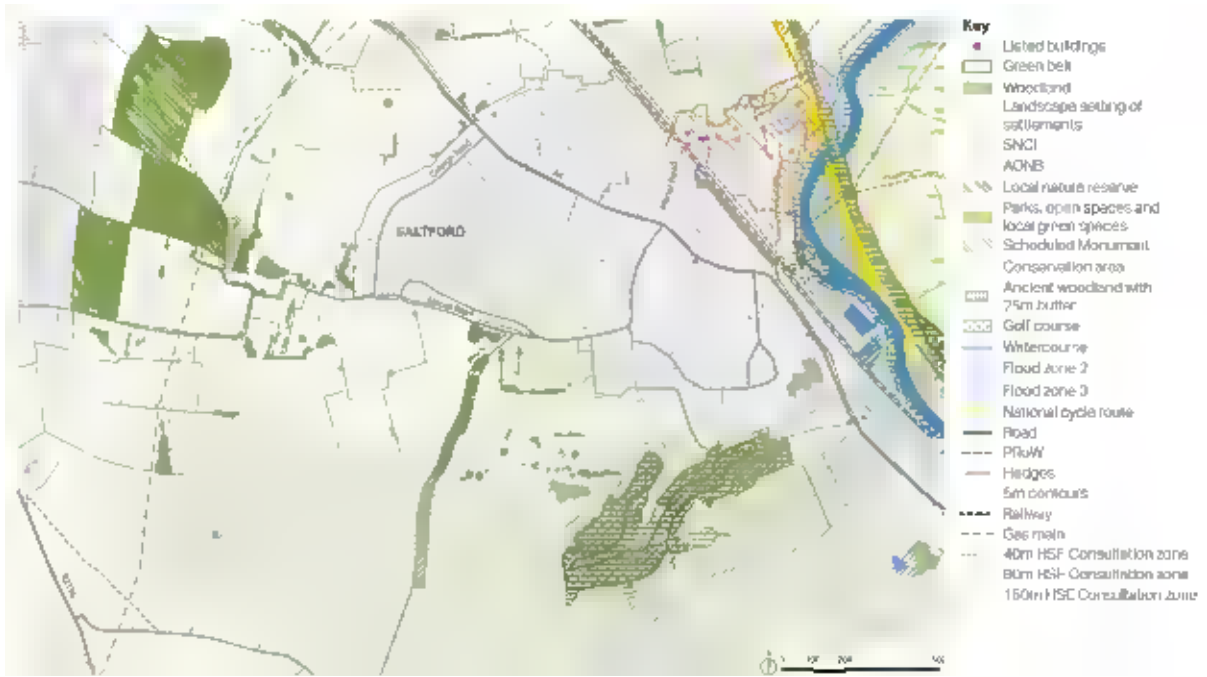


Figure 31: Context plan - South Salford

Site Option



Figure 32: Indicative concept plan - South Salford

South Saltford	Description
<p>Opportunities</p>	<p>Provision of around 800 homes, a new primary school, a village green, and a small local centre, with facilities such as a village shop to serve residents to the south of the village.</p> <p>Opportunity to explore and fund 'Quiet Road' along Manor Road between Keynsham and Saltford, through introduction of a modal filter, or other traffic restrictions, to ensure traffic flows and speeds are low enough to enable active travel between the two settlements. Opportunity to explore Modal filter along Manor Road to the north of the development, to prioritise active modes along the route closest to the new community facilities and primary school.</p>
<p>Constraints</p>	<p>Located in the Green Belt.</p> <p>Requires redevelopment of some areas of golf course.</p> <p>Grade II listed Keynsham Manor house located on Manor Road. Impact on setting to be considered, particularly impact of new primary school building.</p> <p>Currently defined landscape setting of settlement designation located directly to the south of the development parcels. In order to ensure no impact on setting, building heights must not exceed 2-storeys in height, other than along the A4 corridor.</p>
<p>Mitigation required</p>	<p>Requirement for a woodland belt at least 50m wide along the southern edge of the development area to provide a soft backdrop to the housing on shallow slopes.</p>
<p>Further evidence required</p>	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Do you have any evidence or documentation that you would like to upload, to support your answer?

Hicks Gate

Place Profile

- 6.71 The Hicks Gate area is in the Green Belt and stretches west from the Hicks Gate roundabout to the local authority boundary with Bristol, including land to the north and the south of the A4. The wider area, which includes land within Bath and North East Somerset as well as Bristol City Council, largely comprises of agricultural fields typically used for grazing, with a network of public rights of way. This wider area includes to a range of sports pitches, Brislington House, St Brendan's Sixth Form College, allotments and the Brislington Park and Ride Site.
- 6.72 The centre of Bristol is within 4km and Keynsham town centre is within 2km.
- 6.73 The A4 is a strategic transport corridor between Bath and Bristol. It experiences significant congestion in both directions during peak times.



Figure 33: Context plan - Hicks Gate

6.74 Bristol City Council has now published the new [Bristol Local Plan Publication Version \(November 2023\)](#) and 'Policy DS12: New neighbourhood – Bath Road, Brislington' proposes removing land from the Green Belt to the south of the A4 as identified on the aerial photograph below, for the development of 500-750 dwellings. The published Bristol Local Plan also states that if appropriate proposals adjacent to this location come forward, the city council will work with Bath and North East Somerset Council to consider the impacts and opportunities, to assess infrastructure requirements and to ensure integrated and well-planned communities are created.



Figure 34: Extract from Bristol City Council Draft Local Plan showing area proposed to be removed from the Green Belt

Key Issues and Opportunities

- The wider area lies within Bristol City Council and B&NES Council. The local authorities would collaborate to enable the preparation of a comprehensive masterplan to deliver a high quality place to live and work.
- The Hicks Gate area is located within the Green Belt, which in this locality contributes to maintaining a separation between Bristol and Keynsham, and preventing the merger of the city and town. The Strategic Green Belt Assessment (WECA) assesses the wider area as two land parcels (P78 and P79) as having the following contribution to each of the NPPF Green Belt purposes:
 - Purpose 1 - checking the unrestricted sprawl of large built-up areas: P78 and P79 significant contribution
 - Purpose 2 - preventing the merger of neighbouring towns: P78, and P79 significant contribution
 - Purpose 3 – safeguarding the countryside from encroachment: P78, and P79 significant contribution
 - Purpose 4 - Preserving the setting and special character of historic towns: P78 limited / no contribution, P79 moderate contribution
- In order for development to be progressed in the wider area exceptional circumstances would need to be demonstrated in order to justify removing land from the Green Belt. In the Bristol Local Plan Publication Version (November 2023) Bristol City Council is proposing to remove land from the Green Belt within the Bristol administrative area.
- This area has primarily been considered for its potential as a residential led development, coupled with the opportunity for employment led regeneration within the existing and adjacent areas of Bristol. One of the options to be considered as part of this consultation is whether there should be a section of the development area within Bath and North East Somerset that is more focused on the provision of employment floorspace.
- The A4 is a strategic route for vehicles and for freight. The introduction of segregated facilities for walking, cycling, public transport, plus green infrastructure and crossing points would be expected to ensure mobility for residents and mitigate the severance effect of the strategic road.

- As part of comprehensive development there is potential for the Brislington Park and Ride facility in Bristol to be relocated to land within Bath and North East Somerset closer to the Hicks Gate roundabout and in so doing becoming a transport interchange. This would mean that in-bound traffic using the Park and Ride would not pass through the proposed development area.
- The delivery of a transport interchange at Hicks Gate offers the potential to provide a broader range of sustainable connections with surrounding communities, including Keynsham and Bristol's East Fringe. This could include additional bus services, active travel connections, and shared mobility facilities such as E-car clubs, hire bikes and e-scooters. It also would provide access to bus services on the Bristol Bath Strategic Corridor (BBSC), which will benefit from journey time improvements provided by the BBSC project.
- There are few footpaths in Hicks Gate, reducing connectivity within and through the area. The A4 severs movement across the area and cycling is restricted along this busy route. Cycle routes could be relocated away from the A4 to provide active travel links and improve the air quality.
- In terms of access to natural spaces, there is no connection to the River Avon and Stockwood Vale Golf Course restricts access to the wider countryside to the south.
- The landscape setting within the Hicks Gate area is sensitive, particularly in relation to the land immediately to the south of the A4 before the land slopes upwards. This area has a coherent landscape with small to medium late or post medieval permanent pasture (mostly) fields and excellent original, tall hedgerows.
- Existing hedgerows within the area are an important resource for associated wildlife. They need to be integrated in the new development and any hedgerow loss must be compensated at some other areas in line with the BNG and nature recovery requirements and strategies.
- The issue of the potential adverse impact on the water quality of the stream within the site should be taken into account and mitigations should be applied.
- There are very few residents currently in the Hicks Gate area. One of the challenges will be to create a community with appropriate infrastructure and mix of uses.

Priorities and Objectives

- 6.75 The priorities and objectives for the Hicks Gate Area are set out below. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.
- 6.76 The options proposed have been informed by a suite of evidence base material covering transport, landscape character, ecology and many other subjects. Following a comprehensive analysis of the constraints and opportunities, partly formulated through a series of design workshops, the following emerging priorities and objectives are proposed to help shape the placemaking aspirations and provide substance to the opportunity for strategic development at Hicks Gate. These are:
- Maximise the delivery of housing that is affordable in response to social and economic needs, and local demographics.
 - Deliver zero-carbon homes and a built environment that seeks to meet the challenge of climate change by delivering a development that is both resilient and enduring.
 - Consider the opportunities to deliver a greater proportion of employment led development within the Bath and North East Somerset area.
 - The development will be compact, with an efficient use of the available land predicated on a well-balanced housing density, and a mix of house sizes, typologies and tenures.
 - Development at Hicks Gate will seek to complement existing provision of services and amenities providing for the needs of both new and existing communities.
 - The land use mixes across the site should be flexible, balanced and complementary with residential, community and leisure facilities, local services, retail, employment, offices and studios, all woven together to create a place that is truly designed for a healthy work-life balance.
 - Reduce the need to travel, particularly by retaining and providing jobs, services and community facilities at suitable locations close to residential areas.
 - Safeguard existing habitats and seek opportunities to deliver at least 20% biodiversity net gain with a strong network of hedgerows and flower rich verges throughout.

- Promote strategic green infrastructure and compensatory improvements in the remaining Green Belt gap between Bristol and Keynsham.
- Provide a range of sports, recreational facilities, parks and open spaces incorporating existing landscape assets to enable new residents to have an easy access to nature and promote active modes of travel.
- Provide tree-lined streets and public spaces to promote a sense of well-being as well as providing shading and cooling in the summer months and contributing towards the development's climate change resilience capabilities.
- Integrate natural water management solutions to achieve resilient places to respond to the challenge of water stress by integrating sustainable urban drainage systems (SuDS), rain gardens, permeable pavers and rooftop gardens.

6.77 The diagram below, represents these conceptual themes:

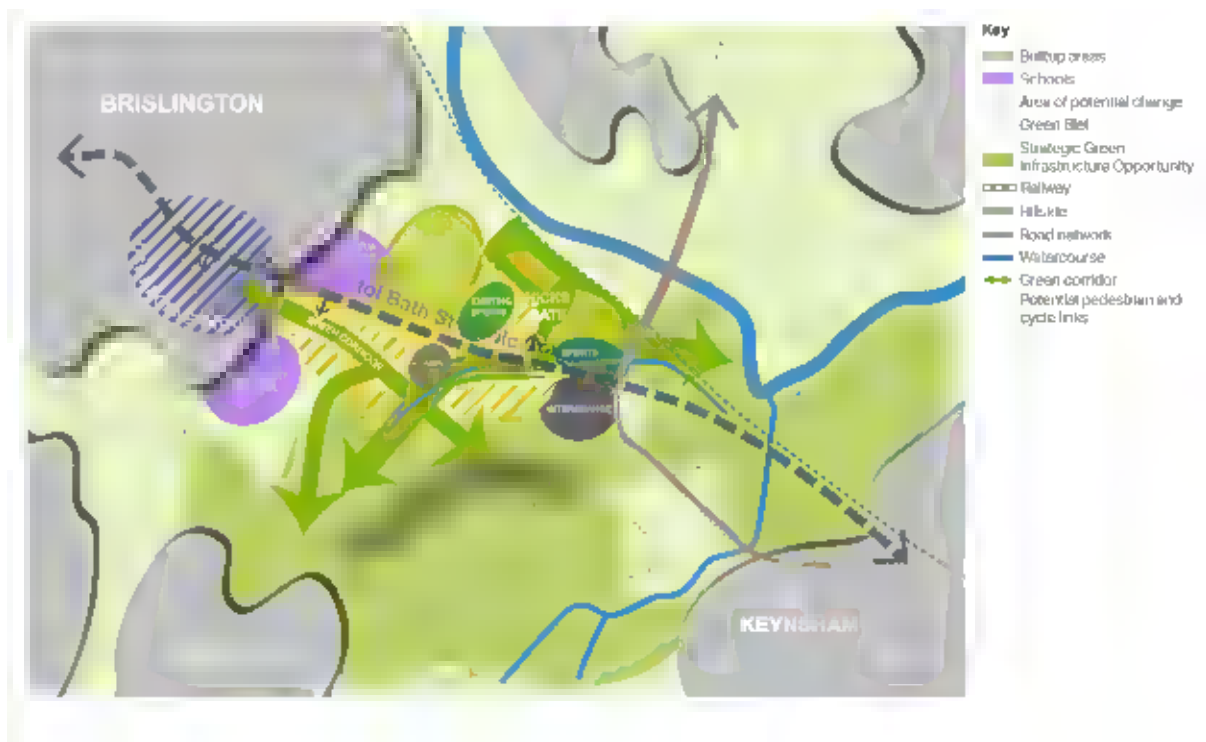


Figure 35: Indicative concept plan - Hicks Gate

Transport Opportunities

6.78 Some of the key issues in the Hicks Gate area relate to transport and highways and a number of opportunities and potential interventions have been identified. These interventions will need more detailed consideration whilst working up the Draft Local Plan, including mechanisms for funding them:

- As part of the City Regional Sustainable Transport Settlement, the Bristol to Bath Corridor project is being led by WECA and delivered in partnership with B&NES Council and Bristol City Council. It aims to improve travel between Bath and Bristol through better bus services and enabling more cycling and walking, through the delivery of a Mass Transit corridor which will pass along the A4 through Hicks Gate. The current scope of the project includes bus priority measures, road space reallocation, enhancement to bus stops, improved walking and cycling facilities and improvements to the public realm. The project intends to improve sustainable movement along the corridor.
- The Park and Ride site at Brislington is proposed to be relocated, expanded, and increased in functionality to provide interchange between a variety of transport modes to provide a network of connections across the local area. The south west corner of the Hicks Gate Roundabout has been identified as the preferred location.
- The new community will integrate with existing communities via a network of sustainable, accessible and green movement corridors, allowing people to access amenities and services in the Hicks Gate area and across the wider Keynsham and south-east Bristol area. Hicks Gate will be a low-car settlement, promoting limited through routes within the development and focusing on walking and cycling, and accessible and competitive public transport opportunities.
- Improving public spaces and routes, including crossing facilities on the A4 to encourage people to use public transport and active modes of travel.
- Existing pedestrian and cycle connections can be enhanced and integrated with new proposals across the area to ensure wider commuter routes north-south and east-west. It can connect the Hicks Gate area to Bristol, Stockwood, and Keynsham.
- Extension of short-term E-scooter and E-Bike rental within the Hicks Gate area.
- Additional bus routes to link with a greater range of places such as Keynsham, Whitchurch Village and Bristol's East Fringe.

- WEST Link Demand Responsive Travel (DRT) zones in Bath and North East Somerset and Bristol shows zones are currently located immediately to the east and west of the Hicks Gate study area. DRT could be used to connect an Interchange Hub at Hicks Gate, where passengers can gain access to a connecting bus or rail service to complete their journey.
- Work with bus operators and other key stakeholders to decarbonise the bus fleet in the Hicks Gate area.
- Introduce more Electric Vehicle charging points in the Hicks Gate area.

Site Options

- 6.79 Two broad options for development have emerged and these are described in more detail below.
- 6.80 It should be noted this area has primarily been considered as a residential led development, with the opportunity for employment led regeneration within the existing and adjacent areas of Bristol. As set out in chapter 3 above there is a need to plan for additional employment space within Bath and North East Somerset in order to help facilitate a more prosperous, sustainable and fairer economy and this location may have the potential to accommodate employment uses. Therefore, an issue to be considered for both options set out below is whether there should be a section of the development area within Bath and North East Somerset that is focused on the provision of employment floorspace. This would rebalance some of these development parcels and provide a greater proportion of employment and less housing development. A logical location for an employment element could be adjacent to the proposed Transport Interchange.
- 6.81 The principle difference between the two options is that the first option sought to respond more appropriately to the landscape sensitivity evidence by maintaining and enhancing a larger gap between the Hicks Gate area and Keynsham, and avoiding development up to the proposed transport interchange. There is a lesser quantum of development for this option.
- 6.82 The second option is proposing to increase the quantum of development. It would need to ensure that a sufficient Green Belt gap between the Hicks Gate area and Keynsham is retained

Hicks Gate Option 1

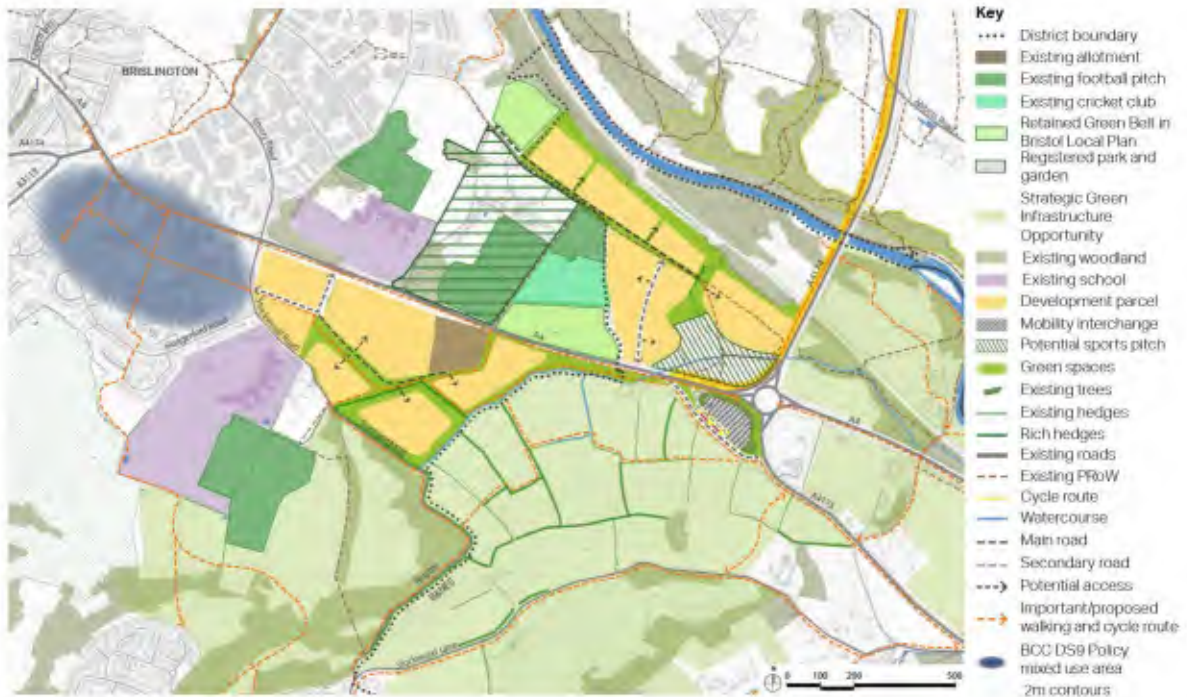


Figure 36: Indicative concept plan - Hicks Gate Option 1

Hicks Gate Option 1	Description
Opportunities	<p>The delivery of a vibrant, well connected, low carbon community, within a high-quality, nature positive, urban environment that is in harmony with its attractive landscape setting. It will be an exemplar for sustainable living and working, providing new approaches to sustainable transport, with high levels of public transport and active travel use. It will have integrated green and blue infrastructure, rich in biodiversity, and unlock improvements to the quality and accessibility of the surrounding countryside and the strategic green infrastructure opportunity.</p>
Constraints	<p>Located in the Green Belt.</p> <p>The A4 corridor is an important strategic transport corridor into Bristol and currently gets congested.</p> <p>Parts of the site are located in areas of landscape sensitivity – further assessment and consideration of appropriate mitigation required.</p> <p>Secondary school pupils within Bath and North East Somerset would need safe access to Broadlands in Keynsham.</p> <p>Delivery requires close co-ordination between B&NES Council and Bristol City Council. It will be crucial for the local authorities to collaborate to enable the preparation of a comprehensive masterplan to deliver a high quality place to live and work.</p>
Mitigation required	<p>Measures to optimise the attractiveness and use of public transport and active travel, including delivery of the Bristol to Bath Strategic Corridor project including consideration of the location and accessibility of bus stops on the A4. Pedestrian and cycle crossings will be required over the A4 to alleviate severance issues</p> <p>Significant green infrastructure and planting required throughout and along the edge of the development sites.</p> <p>Seek to make improvements, including enhanced access to the remaining Green Belt land, providing opportunities for outdoor sport and recreation, retaining and enhancing landscapes, visual amenity and biodiversity.</p>

<p>Further evidence required</p>	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Landscape sensitivity assessment and mitigation.</p>
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Hicks Gate Option 2

6.83 Hicks Gate Option 2 follows a very similar development proposition to the first option but is looking at a more extensive development area to the south of the A4. This is acknowledged to have more substantial impacts on landscape character. It would need to ensure that a sufficient Green Belt gap between the Hicks Gate area and Keynsham is retained.

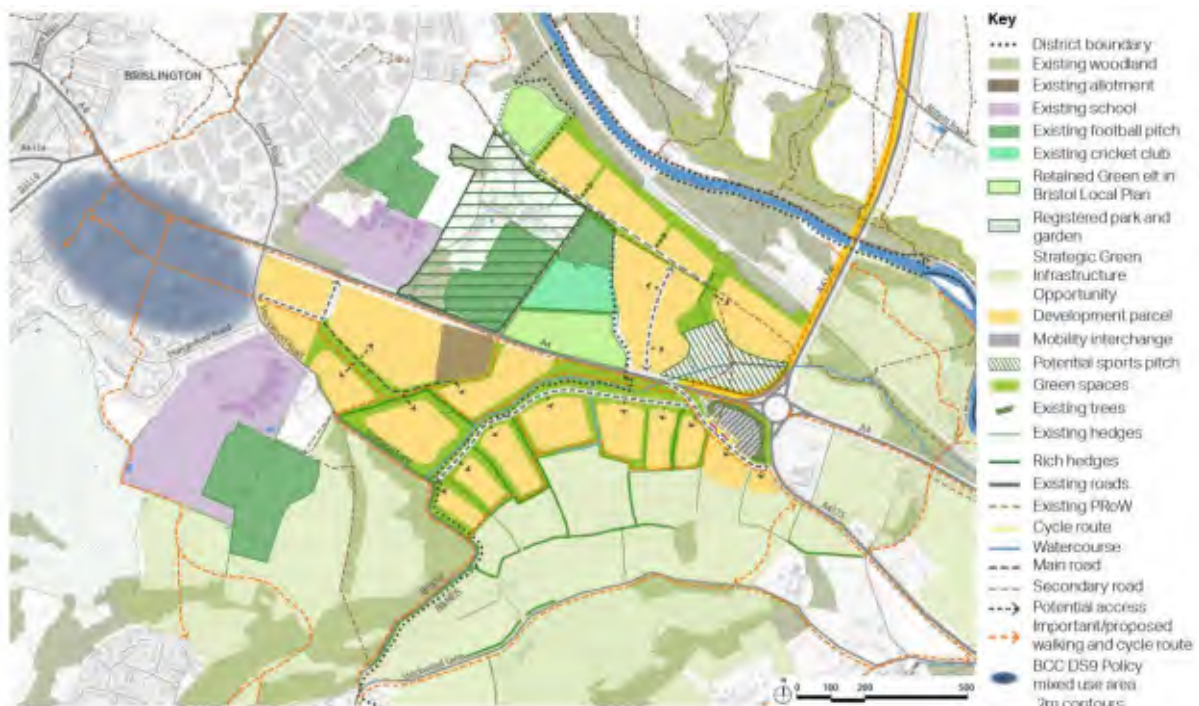


Figure 37: Indicative concept plan - Hicks Gate Option 2

Hicks Gate Option 2	Description
Opportunities	<p>The delivery of a vibrant, well connected, low carbon community, within a high-quality, nature positive, urban environment that is in harmony with its attractive landscape setting. It will be an exemplar for sustainable living and working, providing new approaches to sustainable transport, with high levels of public transport and active travel use. It will have integrated green and blue infrastructure, rich in biodiversity, and unlock improvements to the quality and accessibility of the surrounding countryside.</p>
Constraints	<p>Located in the Green Belt.</p> <p>The A4 corridor is an important strategic transport corridor into Bristol and can get congested.</p> <p>This option proposes more development than Option 1 in areas of landscape sensitivity – further assessment and consideration of appropriate mitigation required.</p> <p>Secondary school pupils within B&NES would need safe access to Broadlands in Keynsham.</p> <p>Delivery requires co-ordination between B&NES and Bristol City Council. It will be crucial for the local authorities to collaborate to enable the preparation of a comprehensive masterplan to deliver a high quality place to live and work.</p>
Mitigation required	<p>Careful consideration of the location and accessibility of bus stops on the A4 to optimise public transport use by residents. Pedestrian and cycle crossings will be required over the A4 to alleviate severance issues.</p> <p>Significant green infrastructure and planting required throughout and along the edge of the development sites.</p> <p>Seek to make improvements, including enhanced access, to the remaining Green Belt land, providing opportunities for outdoor sport and recreation, retaining and enhancing landscapes, visual amenity and biodiversity.</p>

Further evidence required	Green Belt assessment required to further assess the impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Landscape sensitivity assessment and mitigation.
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Do you support development at Hicks Gate? If so, which option is preferable? Please provide reasoning.

What land uses should be prioritised?

- (i) Residential led with associated infrastructure**
- (ii) A shift in the balance between residential and employment providing a greater amount of employment space**

Whitchurch Village

Place Profile

- 6.84 Whitchurch Village is located within the northern part of B&NES, with a population of around 2,000 people. It sits directly south of Stockwood and east of Hartcliffe in Bristol. The administrative area of Bristol City Council lies immediately to the north and east of the Village. The village of Queen Charlton lies to the east, and the town of Keynsham to the north east. More recent development has increased the number of houses in the village by around 250 homes, but did not bring with it any supporting facilities. The existing village lacks certain amenities such as a village shop, although the existing music shop sells some convenience goods.
- 6.85 Whitchurch Village is surrounded nearly entirely by Green Belt, separating it from Bristol to the north and west, and Keynsham to the east. Any new development adjoining the village would require the removal of land from the Green Belt, and removal would require exceptional circumstances to be fully evidenced and justified.



Figure 38: Context plan - Whitchurch Village

- 6.86 The local transport network for Whitchurch Village is characterised by the dominance of private car journeys. This contributes to the high traffic volumes on the A37 which bisects the village. The lack of sustainable alternatives, notably a railway station, results in a high proportion of out-commuting, particularly to Bristol. For local journeys, walking, cycling and wheeling are not popular choices because of the lack of safe and convenient routes. There are a limited range of destinations served by direct bus services, although Whitchurch Village is well-served by frequent bus services to Bristol City Centre.
- 6.87 The WECA Joint Local Transport Plan 4 (JLTP4) identified the South East Bristol Orbital Low Carbon Corridor project as an opportunity to provide a multimodal orbital corridor close to Whitchurch Village to facilitate north/south connectivity. However, this project is now under review through the preparation of WECA Joint Local Transport Plan 5 (JLTP5), which is being prepared in the context of the climate emergency declared by each of the local authorities.
- 6.88 Various important heritage assets are located within and surrounding the village. Of particular note is Maes Knoll Scheduled Ancient Monument, which is located around 2km to the south west of Whitchurch Village (see figure 36). Maes Knoll is a substantial, univallate fort enclosing the eastern end and highest point of a plateau of high ground running approximately west to east for around 3km from East Dundry. Maes Knoll is a visually prominent local landmark, with its distinctive flat-topped profile visible across large areas of Bristol and north-east Somerset. In turn, views from the site are very extensive, reaching as far as both Severn crossings and a swathe of historic Somerset. The setting of Maes Knoll is defined by its hilltop location. Its elevated location affords panoramic views of the immediate fields on the hillslopes and the green buffer surrounding suburban Bristol.
- 6.89 A Statement of Heritage Significance and Appraisal of Risk of Harm for all heritage assets in and around Whitchurch Village, including Maes Knoll Scheduled Ancient Monument, has been carried out to inform the preparation of the options set out in this chapter. The diagram below provides a summary of this assessment, indicating, using a RAG rating, the parcels of land on which development would likely cause the most harm to the significance of one or more heritage assets.
- 6.90 The options shown below for Whitchurch Village have been directed to locations where harm to heritage assets would likely fall within the NPPF definition of 'less than substantial harm' or could be reduced by appropriate mitigation such as landscape design solutions. Any future development on land parcels assessed to cause less than substantial harm to a heritage asset will need to weigh this harm against any public benefits that are provided by developing the parcel.

Rating	Level of Risk of Harm to Asset
Very high	An area of high importance and sensitivity, where development would have the greatest impact. The development of the site is likely to be of such a scale that the significance of the heritage asset would experience significant harm, up to and potentially including 'substantial harm' for the purposes of the NPPF, with no potential for meaningful mitigation.
High	An area of high importance and sensitivity, where development would have a significant impact. Development of the site is likely to result in a significant harmful impact on the significance of the heritage asset, but this could be reduced (but not removed) via appropriate mitigation.
High – medium	Area of medium-high importance and sensitivity where development would have a harmful impact if no mitigation occurred. Development of the site could result in a harmful impact on the significance of the heritage asset but this impact is likely to fall within the definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions).
Medium	Area of medium importance and sensitivity. The development of the site may result in a harmful impact to the significance of a heritage asset but it is likely that these impacts could be avoided via appropriate mitigation (such as via landscape design solutions).
Medium - low	Area of medium to low sensitivity. Potential impact will be of such a minimal scale that the significance of the heritage asset will not be harmed.
Low	Area of low sensitivity. development of the site is likely to result in minimal impact on the significance of the asset. It is likely that no mitigation would be required.

6.92 The area is also highly sensitive in terms of landscape impact. A Landscape and Visual Impact Assessment was carried out in 2017, which assessed the significance of effects of development on landscape and views for land parcels surrounding Whitchurch Village. The summary results of the assessment are shown on the diagram below. All of the site options for Whitchurch Village include development of parcels rated as having a high or medium-high negative significance of effects. These are noted in the constraints for each site, and if any allocations are proposed in Whitchurch Village at Draft Plan stage, these will need to be informed by additional landscape sensitivity work, and consideration of potential mitigation.

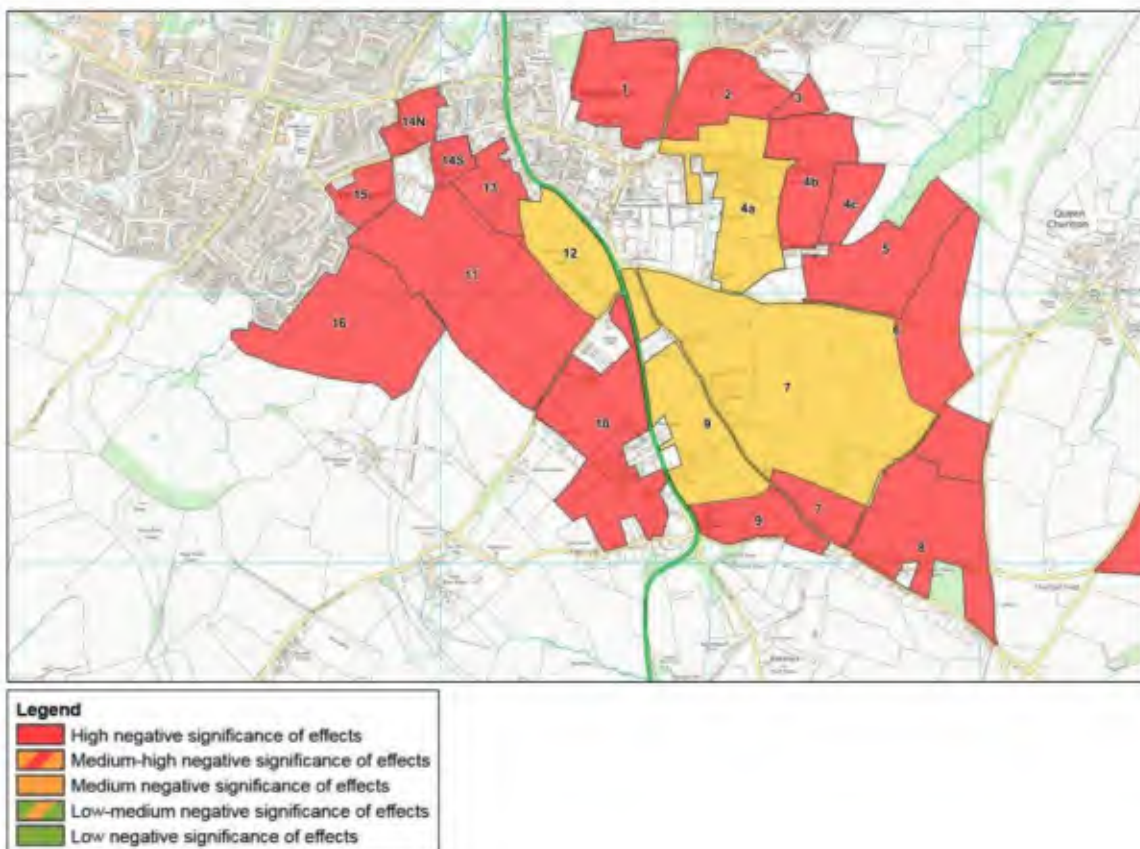


Figure 40: Extract from 2017 Landscape and Visual Impact Assessment

Key Issues and Opportunities

- Lack of employment in the local area results in out-commuting, mostly by car.
- Whitchurch Village is surrounded nearly entirely by Green Belt, separating it from Bristol to the north and west, and Keynsham to the east.
- A number of important heritage assets are located in and around the village, including Maes Knoll and Wansdyke Scheduled Ancient Monuments located to the south west.
- Landscape sensitivity assessments carried out in the area surrounding Whitchurch Village indicate that land located to the south of the village, between the village and Maes Knoll, is of particularly high landscape sensitivity, apart from a small parcel of land directly adjoining the A37 to the west, which is assessed to have a medium landscape sensitivity. Parcels of land directly adjoining the village to the east are also assessed as having a medium landscape sensitivity, becoming more highly sensitive moving further east.
- There is currently no dedicated shop in the village to buy convenience goods, though the existing music shop sells some convenience items. There are a limited number of commercial units, a pub / restaurant, a primary school and sports facilities. Growth of the village in recent years did not include provision of any supporting facilities.
- The village primary school is currently close to capacity, with no space for on-site expansion. The existing school could accommodate pupils from around 150 new homes, but any larger scale of development would need to be supported by a new primary school.
- Secondary age pupils from any new development at Whitchurch Village will need to be transported to Broadlands School in Keynsham, at cost to the Council. These pupils will not be able to travel to school sustainably by active modes.
- High traffic volumes cause congestion issues along the A37 corridor, particularly at peak times.
- Footway widths are narrow at points along the A37, and the carriageway width is frequently constrained by on-street parking.

- The village play park is well-used, but is located along the A37 at the southern end of the village, accessed via a very narrow footpath along A37. A new signalised crossing to be installed as part of the Whitchurch Village Low Traffic Neighbourhood Scheme will improve access to the play park from the east.
- The A37 severs the east and west parts of the village, and there are limited pedestrian crossings across the busy road.
- There are inadequate walking and cycle facilities on the A37 corridor, owing to the constrained carriageway and footway widths along parts of its length.
- There are limited orbital routes available for journeys to the northeast and northwest of the Whitchurch Village for both the private car and sustainable modes.

Priorities and Objectives

6.93 The following list sets out the key priorities and objectives for Whitchurch Village. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Maximise the delivery of affordable housing responding to local social and economic needs, and local demographics, including provision of homes fit for downsizing and single people.
- Provision of small-scale local employment space in order to provide the opportunity for local residents to be able to access and thrive in good work.
- Retain green buffer between Bristol and Whitchurch Village, in order to ensure that the two do not merge
- Preserve and enhance the settlement's village identity
- Provision of new local facilities such as a village shop, community facilities and spaces to increase social interaction and encourage local living.
- Protect heritage assets and their settings.
- Protect areas of landscape sensitivity.
- Maximise ecological mitigation and Biodiversity Net Gain.

- Create a safe and attractive walking route between the village centre and the existing playground located to the south of the village.
- Enhance connectivity and access to the surrounding countryside including to Maes Knoll through better provision of active travel routes.
- Encourage the use of sustainable travel choices and reduce reliance on car use.

Do you support this approach?

Transport Opportunities

6.94 Some of the key issues in Whitchurch Village relate to transport and highways, as listed above. A number of transport opportunities and potential interventions have been identified for Whitchurch Village. These interventions will need more detailed consideration whilst working up the Draft Local Plan, including mechanisms for funding them.

- Improving the connectivity for active travel, reducing the severance of the A37 corridor.
- Improving access routes for pedestrians to facilities including the South Bristol hospital and Leisure Centre, to reduce the need to travel further afield.
- Improving public spaces and routes, including crossing facilities, to encourage people to use active modes of travel, including:
 - Building on the success of the existing Liveable Neighbourhood scheme at Queen Charlton Lane to create greener, safer spaces for people, and;
 - New signalised pedestrian and cycle crossings on the busiest routes to improve safety of those using active travel modes.
- Identifying minor rural roads to be designated as Quiet Lanes to provide safer routes for active travel, away from speeding traffic.
- Extension of short-term E-scooter and E-Bike rental within Whitchurch Village.
- Provision of a mobility hub in Whitchurch Village on the A37, providing a host of transport options in one place, allowing people to change modes easily between shared transport such as car clubs and e-scooters, public transport and active travel modes.

- Bus priority measures could be considered and provided along the A37 corridor.
- There is a need for Whitchurch Village to have good access to the facilities and services in Keynsham, such as Broadlands Academy. A new bus service between Keynsham and Whitchurch Village would fill a gap in the existing provision.
- Demand Responsive transport (DRT) can complement fixed route public transport on the main corridors by providing connections into these existing services. WESTLink South zone currently runs through the middle of Whitchurch Village. DRT could be used to connect to the proposed mobility hub within Whitchurch Village, where passengers can gain access to a connecting bus or rail service to complete their journey.

Do you support this approach?

Site Options

- 6.95 A variety of site options for development are set out below, which have been prepared in response to the key issues, priorities and objectives set out above. Explanation as to how each of the site options responds to the key issues, priorities and objectives is set out within the opportunities and constraints tables for each site option. Where mitigation or additional evidence work is required to achieve priorities and objectives, this is referenced within the table.
- 6.96 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the Housing and Economic Land Availability Assessment (HELAA), the Sustainability Appraisal (SA), and the Whitchurch Village Strategic Planning Options Document (SPO). The table below sets out the HELAA and SA references relevant to each site option:

Local Plan Site Option	HELAA	SA
Whitchurch Village Option A	WCH03, WCH04a,WCH26, WCH26b, WCH26d, WCH08, WCH29,WCH30	W1, W3, W4
Whitchurch Village Option B	WCH21, WCH22, WCH22B, WCH08, WCH29, WCH30	W1, W2
Whitchurch Village Option C	WCH26, WCH26d	W4
Whitchurch Village Option D	WCH22	W2

- 6.97 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define site specific interventions required.
- 6.98 Options A and B provide around 500-600 new homes. This is the minimum number of homes considered to be required to support a new primary school in the village. This quantum of development is also more likely to be able to support the provision of other facilities such as a new village shop.
- 6.99 Options C and D provide 150 new homes. This is the maximum number of homes considered able to be supported by the existing village primary school. This quantum of development would be unlikely to support provision of other facilities for the village.

Are there any other sites that haven't been identified, that need to be considered?

Whitchurch Village Option A: Land to the west and east of the A37

6.100 Option A includes:

- Land located to the west of the A37, between Norton Lane to the south, and Blackacre to the north, and
- A triangle of land to the east of the A37, between the A37 and Queen Charlton Lane.

6.101 The land is primarily used as arable fields. However, the Bristol Barbarians RFC club is located in the south-eastern part of the area, which would need to be relocated to the south if this option was to be taken forward.

6.102 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P92, P93 and P94) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: P92, P93 and P94 significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: P92 moderate contribution, P93 and P94 limited / no contribution
- Purpose 3 – safeguarding the countryside from encroachment: P92 and P94 significant contribution, P93 moderate contribution
- Purpose 4 - Preserving the setting and special character of historic towns: P92, P93, P94 limited / no contribution

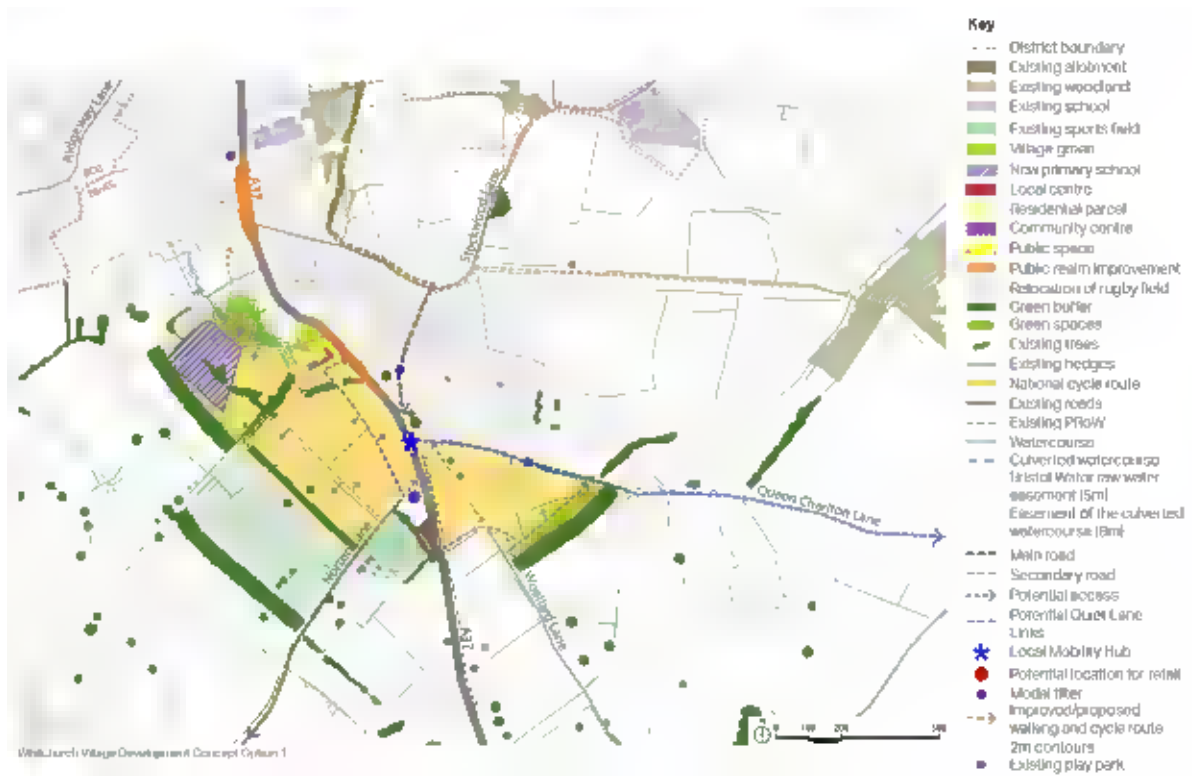


Figure 41: Indicative concept plan – Whitchurch Village Option A

Whitchurch Village Option A	Description
<p>Opportunities</p>	<p>Provision of around 500-600 homes, plus extension of existing village centre along A37, with provision of a primary school, village green, village shop, and other community facilities.</p> <p>Located close to the existing village centre, and with good access by active travel modes to facilities located in Whitchurch Bristol.</p> <p>Safe and attractive walking route from north west end of village to existing village playground.</p> <p>Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.</p>

<p>Constraints</p>	<p>Located in the Green Belt.</p> <p>Requires relocation of rugby club further south.</p> <p>Further exploration required relating to whether relocated rugby club could be adequately accommodated within the existing hedgerow network, with buffers.</p> <p>The majority of this option is located within areas assessed to have either a high-medium, or medium risk of harm to heritage assets in the area. In these areas it is considered that development could result in a harmful impact on the significance of heritage assets but this impact is likely to fall within the definition of ‘less than substantial harm’, and/or could be reduced via appropriate mitigation (such as via landscape design solutions). Some of the land parcels located to the south west of the option are located in areas assessed to have a high risk of harm to heritage assets, where it is considered that development would likely result in a significant harmful impact on the significance of heritage assets, but that this could be reduced (but not removed) via appropriate mitigation. Any harm will need to be weighed against public benefits that are provided by developing the parcel.</p> <p>Development would impact historic field pattern to the west of A37.</p> <p>Located in area of high landscape sensitivity – further assessment and consideration of appropriate mitigation required.</p> <p>Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using active modes.</p> <p>Although located close to the existing village centre and facilities within Whitchurch Bristol, without improved public realm and crossings along A37, severance with the existing village could occur.</p>
<p>Mitigation required</p>	<p>Careful consideration of pedestrian and cycle crossings required within public realm improvements to alleviate severance issues.</p> <p>Significant green infrastructure and planting required throughout and along the edge of the development parcels, to provide softening to edges of development, and mitigate impact on landscape and heritage assets located to the south.</p>

<p>Further evidence required</p>	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.</p> <p>Impact of development on historic field patterns to be considered.</p>
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Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Do you have any evidence or documentation that you would like to upload, to support your answer?

Whitchurch Village Option B: Eastern extension of the village

6.103 Option B comprises:

- A triangle of land located directly east of the A37 between the A37 and Queen Charlton Road, and
- Land adjoining the village to the east, currently occupied by Horseworld.

6.104 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P92) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: moderate contribution
- Purpose 3 – safeguarding the countryside from encroachment: significant contribution
- Purpose 4 - Preserving the setting and special character of historic towns: limited / no contribution



Whitchurch Village Option B	Description
<p>Opportunities</p>	<p>Provision of around 500-600 homes.</p> <p>Residential-led mixed-use development, including provision of a primary school and small-scale employment space.</p> <p>Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.</p> <p>Development in location less sensitive in heritage and landscape terms.</p> <p>Opportunity to improve access for residents into Stockwood Vale Valleys, and walking routes across to Keynsham.</p>
<p>Constraints</p>	<p>Located in the Green Belt.</p> <p>Not considered to be a particularly good location to provide a village shop, due to distance from existing village centre and the A37.</p> <p>Significant walking distances from eastern edge of development parcels to existing village centre, and facilities located in Whitchurch Bristol.</p> <p>Land parcels making up this option are located within areas assessed to have either a low risk of harm to heritage assets, or in areas of high-medium, or medium risk of harm to heritage assets. In the latter two areas it is considered that development could result in a harmful impact on the significance of heritage assets, but this impact is likely to fall within the definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions). Any harm will need to be weighed against public benefits that are provided by developing the parcel.</p> <p>Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using active modes.</p>

<p>Mitigation required</p>	<p>Significant green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area.</p> <p>Green infrastructure required along A37 to soften edge of development parcel when viewed from heritage assets located to the south west.</p>
<p>Further evidence required</p>	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Do you have any evidence or documentation that you would like to upload, to support your answer?

Whitchurch Village Option C: Land to the west of the A37 (150 homes)

6.105 Option C comprises a small parcel of land located to the west of the A37, accessed directly from this road. The land is currently used as arable fields, and sits to the rear of a single row of residential units located along the A37.

6.106 This option is capped at 150 new homes, which is the quantum considered to generate the number of primary school aged children that could be accommodated by the existing primary school.

6.107 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P93) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: limited / no contribution
- Purpose 3 – safeguarding the countryside from encroachment: P93 moderate contribution
- Purpose 4 - Preserving the setting and special character of historic towns: limited / no contribution



Figure 43: Indicative concept plan - Whitchurch Village Option C

Whitchurch Village Option C	Description
Opportunities	<p>Provision of 150 homes</p> <p>Quantum of housing able to be accommodated at existing primary school.</p> <p>Located close to the existing village centre, and with good access by active travel modes to facilities located in Whitchurch Bristol.</p> <p>Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Potential to cause a medium level of harm to the significance of St Nicholas Church and Lyons Court Farmhouse. This harm is likely to fall within the NPPF definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions).</p> <p>Development would impact on historic field pattern to the west of A37.</p> <p>Located in area of high landscape sensitivity – further assessment and consideration of appropriate mitigation required.</p> <p>Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using active modes.</p> <p>Although located close to the existing village centre and facilities within Whitchurch Bristol, without improved public realm and crossings along A37, severance with the existing village could occur.</p>

<p>Mitigation required</p>	<p>Careful consideration of pedestrian and cycle crossings required within public realm improvements to alleviate severance issues.</p> <p>Significant green infrastructure and planting required throughout and along the edge of the development parcels , to provide softening to edges of development, and mitigate impact on landscape and heritage assets.</p> <p>50m green buffer required along south and west edges of development parcels, to mitigate harm to heritage and landscape assets, including Lyon’s Court Farm and Maes Knoll.</p>
<p>Further evidence required</p>	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Impact of development on historic field patterns to be considered.</p> <p>Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Do you have any evidence or documentation that you would like to upload, to support your answer?

Whitchurch Village Option D: Eastern extension of the Village (150 homes)

- 6.108 Option D comprises a parcel of land located to the east of the village, currently occupied by Horseworld.
- 6.109 This option is capped at 150 new homes, which is the quantum considered to generate the number of primary school aged children that could be accommodated by the existing primary school.
- 6.110 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P92) as making the following contribution to each of the NPPF Green Belt purposes:
- Purpose 1 - checking the unrestricted sprawl of large built-up areas: significant contribution
 - Purpose 2 - preventing the merger of neighbouring towns: moderate contribution
 - Purpose 3 – safeguarding the countryside from encroachment: significant contribution
 - Purpose 4 - Preserving the setting and special character of historic towns: limited / no contribution



Figure 44: Indicative concept plan - Whitchurch Village Option D

Whitchurch Village Option D	Description
Opportunities	<p>Provision of around 150 homes.</p> <p>Development in location less sensitive in heritage and landscape terms.</p> <p>Opportunity to improve access for residents into Stockwood Vale Valleys.</p> <p>Quantum of housing able to be accommodated at existing primary school.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Significant walking distance to existing village centre, and from facilities located in Whitchurch Bristol.</p> <p>Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using active modes.</p>
Mitigation required	<p>50m green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area.</p>
Further evidence required	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Do you have any evidence or documentation that you would like to upload, to support your answer?

Do you have a strong preference for any of the Site Options, A, B, C or D? If you have a preference for any combination of Options, please tell us which ones, and why.

Which considerations do you think are most important, when deciding whether to build new homes in Whitchurch Village, where to build, or how many to build?

Please tell us if you have any other ideas or suggestions for how we can meet local housing need in Whitchurch Village. This could be amendments to the existing Site Options, or brand new sites or approaches.

7 Somer Valley: Vision, Strategy and Options

Strategy Overview and Key Issues



Figure 45: Map showing location of the Somer Valley

- 7.1 The section below relates to the Somer Valley area illustrated on the map above and primarily outlines context, key issues, priorities and opportunities. It is followed by sections on specific places within the Somer Valley.
- 7.2 The Somer Valley area covers a large area including many larger and smaller settlements surrounded by hilly countryside and attractive green spaces. The larger settlements are Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John and these settlements all have their own character and different amenities.
- 7.3 The area has a rich industrial and mining history, and this heritage is visible in both the settlements and landscape. Some of the paths to the old mines are still in use and old railway lines and the canal have found a more recreational use. The batches from former mining work characterise the surrounding landscape and can have high ecological value and nature recovery potential.

- 7.4 There has been significant population growth in the Somer Valley between the 2011 and 2021 censuses with 36,546 people recorded in the 2011 Census, which increased to 52,264 residents in 2021. In terms of household size, the largest percentage of households in the Somer Valley are made up of two people. There is a high level of out commuting and a high level of car use.
- 7.5 Manufacturing, Construction, and Transport & Storage are the most concentrated sectors for employment in the Somer Valley relative to Bath and North East Somerset as a whole. The Somer Valley's absolute employment numbers in Construction, Professional, Scientific & Technical, Administrative & Support Services, and Human Health and Social Work have increased, and there has been growth in other sectors as well. There have been significant employment losses in Manufacturing in the Somer Valley in recent decades.

Transport

- 7.6 The Somer Valley has a dispersed settlement pattern, an undulating topography and is physically distant to other key settlements such as Bristol and Bath. Somer Valley has relatively limited dedicated cycle infrastructure and no railway provision and therefore, to access rail services residents need to travel to Bath, Bristol or Frome. There is a lack of bus connections between the east and west of the Somer Valley, poor services in more rural areas and lack of connections between villages. The principal roads within the Somer Valley are the A367, A37, A362 and A39. There is typically congestion during peak hours on the A367, A362 and A39. Congestion and the associated impact of traffic is also experienced within the Somer Valley, notably in the centres of Radstock and Midsomer Norton.

Duty to co-operate

- 7.7 Somerset Council administrative area is located directly to the south of the Somer Valley. Therefore, we are engaging with Somerset Council to discuss strategic cross-boundary matters such as housing provision, transport and other infrastructure.

Key Issues

- Evidence from the Employment Needs Assessment suggests net employment land requirements over the Plan period in the Somer Valley area comprise around:
 - 8000 sqm office space
 - 7-9 ha industrial floorspace
 - 4 ha warehousing / logistics floorspace

Some of this employment land requirement can be provided through existing commitments i.e. sites with planning permission or allocated in the adopted Local Plan for employment development. These existing commitments will need to be reviewed in preparing the Draft Local Plan.

- Restructuring of the local economy has resulted in some businesses closing and an increase in out-commuting.
- The Somer Valley area has had significant housing development over the adopted Local Plan period from 2011. However, that has been delivered on a piecemeal basis with little infrastructure provision resulting from and needed to serve development.
- Midsomer Norton and Radstock town centres have limited footfall due to the lack of diversity in retail offers, as well as a lack of an attractive food and beverage offer.
- There is a lack of sustainable and active travel links in the area, and steep topography creates a constraint to active travel. Access to public transport is patchy, and within some areas access is very limited. Bus provision has been reduced in recent years.
- The A37 is a major road that runs through several towns and villages and creates a severance barrier in these communities.
- The Somer Valley has a rich mining heritage, but it could be better promoted and curated.
- There is a lack of wayfinding which impacts residents and visitors ability to access the countryside.

Priorities and Objectives

- Facilitate opportunities to enable existing businesses to be retained and new employers attracted to the Somer Valley, in both established and emerging sectors, and generate a range of jobs that will mean local residents have access to and can thrive in good work
- Provide homes to help meet need, including the provision of homes that are affordable, and a mix of homes to meet the varying accommodation needs of the population, including homes for older people.
- New development should complement the Radstock Town Centre Regeneration Action Plan and the Midsomer Norton Heritage Action Zone aiming to increase footfall to these town centres.

- The Local Plan Partial Update removed the allocation at South Road car park for a supermarket. Opportunities for the use of the site will be reviewed alongside the wider regeneration of Midsomer Norton Town Centre.
- New development should complement the Somer Valley Rediscovered Project to provide greater opportunities for people to engage with and enable nature recovery.
- The Somer Valley has health and wellbeing needs that the built and natural environment can play a role in addressing. The Somer Valley has high levels of childhood obesity, people living in poverty, and levels of physical inactivity, and poor adult mental health. It is also an area with lower levels of active travel.
- New development should complement the Somer Valley Links project to provide a greater choice of transport via sustainable and active travel (walking, cycling, wheeling and public transport).
- WECA have allocated funding to explore the feasibility of mine water heat recovery form district heating.

Do you agree with the issues, priorities and objectives for the Somer Valley? Is there anything else you think we should investigate or include?

Opportunities

Transport Opportunities

- 7.8 Some of the key issues in the Somer Valley relate to transport and highways. A number of transport opportunities and potential interventions have been identified for the Somer Valley. These interventions will need more detailed consideration whilst preparing the Draft Local Plan, including mechanisms for funding them.
- 7.9 The area can be improved in terms of active travel, currently there is a high level of out community and limited active travel links. Dedicated cycle links can be improved and a network of quiet lanes identified. The extension of e-bike and scooter rental could be provided within the Somer Valley. Development should be located in areas with access to shops and services allowing people to live locally.
- 7.10 The public transport system is being enhanced through the Somer Valley Links project. Through this project bus infrastructure is being improved including the provision of mobility hubs and bus priority lanes. Zero emission buses will help to achieve net zero targets and cleaner air.

Green Infrastructure Opportunities

- 7.11 Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. To enhance and extend the network green infrastructure should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.
- 7.12 Some of the site options set out in this chapter include reference to ‘Strategic Green Infrastructure Opportunities’, which are located outside of the area shown for potential development. These indicate areas where the Council consider that green infrastructure could be provided or improved to meet Natural England green infrastructure standards, and may also offer nature based solutions to address issues such as flooding and nature recovery. New and enhanced green infrastructure will either be funded by development in the area, or through other mechanisms to be explored as we prepare the Draft Local Plan.

Do you agree with this assessment of the opportunities for development in the Somer Valley? Is there anything else we should include? Please give reasons for your answer.

Site Options

- 7.13 A variety of site options for development are set out for each place below, which have been prepared in response to the key issues, priorities and opportunities. Explanation as to how each of the site options responds to the key issues, priorities and objectives is outlined within the opportunities and constraints tables for each site option. Where mitigation or additional evidence work is required to achieve priorities and objectives, this is referenced within the table, as well as any conflicts with priorities and objectives. Each site has sub options relating to the quantum of development that can be achieved.
- 7.14 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the Housing and Economic Land Availability Assessment (HELAA), the Sustainability Appraisal (SA), the Somer Valley Area of Search Assessment, and the Strategic Planning Options Document (SPO). The table below sets out the HELAA and SA references relevant to each site option.

7.15 Within these documents, a number of additional sites have also been assessed, and discounted, for various reasons. These sites are not included in the site options below, for the reasons set out in the evidence base. However, this Options Document consultation provides an opportunity for stakeholders and communities to provide comments on these discounted sites, by answering the question: Are there any other sites that haven't been identified, that need to be considered?

Local Plan Site Option	HELAA	SA
Peasedown	PEA10, PEA15, S2PS30	P2, P3, P4
North Radstock	RAD16a, b, c, d, e, f, g &h, RAD19a, b, c	R1
East Radstock	RAD 21a, RAD21b, RAD23, RAD24, RAD25, RAD 26/26a, RAD40, MDP32, S2PS31	R2
Farrington Gurney North	A37PS14, A37PS15, A37PS15	FG1, FG2
Farrington Gurney South	FAR16, A37PS13, A37PS15	FG3

7.16 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define site specific interventions required.

7.17 On their own each site would not require extensions to existing secondary schools. However, secondary schools in the Somer Valley cover a wide catchment area and therefore if a number of sites were to come forward for development then the cumulative impact on the secondary schools will need to be considered at the site allocation stage in the Draft Local Plan.

Are there any other sites that haven't been identified, that you think we should consider?

Peasedown

Place Profile

- 7.18 Peasedown St John is located to the south west of Bath. The village sits on top of a plateau above the Cam Brook and Wellow Brook Valleys. Both brooks whilst designated as SNCIs, have potential for nature recovery and habitat enhancement. The village has a population of approximately 6,500.
- 7.19 The small hamlet of Carlingcott existed before the large 19th century expansion when the Somerset coalfield was expanded as the Industrial Revolution increased demand for coal. By the second half of the 20th century there were at least six collieries within 3km of Peasedown St John. Evidence of the areas mining heritage can be seen within the landscape, most notably Braysdown Colliery batch which sits to the south of the village.
- 7.20 The south east side of the village was greatly extended in the 1990s which included the provision of a bypass on the A367. The southern boundary of the village is now formed by the Peasedown by-pass. Bath Business Park is located to the south east and is now nearing full occupation.
- 7.21 The village is served by a number of existing amenities such as a primary school, local shops and sports facilities. There are bus connections along the A367 to both Bath and Radstock.



Figure 46: Context plan - Peasedown St John

Key Issues and Opportunities

- The bypass is a hard boundary to the settlement and residential development on the southern side of the bypass would result in severance issues.
- There is an increased requirement and opportunities for employment in the area in order that local residents can access good jobs.
- Development on the northern side of the A367 would enable easy access to the village centre without the need to cross the bypass.
- The village sits on a busy commuter route between Radstock and Bath
- The primary school should be able to accommodate additional children generated by new development. Secondary age pupils from any new development at Peasedown St John will need to be transported to Writhlington School in Radstock, at cost to the Council. These pupils will not be able to travel to school sustainably by active modes.

Priorities and Objectives

7.22 The following list sets out the key priorities and objectives for Peasedown. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Expansion of the Bath Business Park would allow for job growth providing local employment opportunities within the Somer Valley, whilst not impacting on the delivery of employment space at the Somer Valley Enterprise Zone.
- New housing development in Peasedown St John should be well connected for pedestrians to the existing village centre to allow for pavement access.
- Provision of renewable energy

Site Options

- 7.23 The area to the south west of Peasedown St John comprises three fields aligned along the northern side of the A367. While this parcel projects beyond the current boundary of the settlement, it is well connected to the existing urban area and there are clear opportunities to create better connections, particularly in terms of active travel. The land is nestled adjacent to an ancient woodland as well as having a well treed road frontage with hedgerows that reduce intervisibility with other parts of the wider landscape. All of these features and especially the ancient woodland are vulnerable to damage or loss from new development.
- 7.24 The area has the potential to be developed for residential uses, together with landscape and habitat enhancement/creation. There is also scope for the creation of new public transport and active travel connections back into the village and towards key destinations such as the village centre, the church and primary school.
- 7.25 The area south of Peasedown St John is open arable fields which were historically part of a local estate and includes parkland trees. There are several Public Rights of Way leading out into the countryside, originating in the village centre of Peasedown St John and extending out through the area to the south of the A367, which forms a hard, southern edge to the village. The existing buildings on the southern side turn their backs to the A367, as does the residential development on the north side of the road. The parcels on the southern side of the A367 are on a skyline which slopes gently towards the south and is clearly visible in medium- and long-distance views across the valley. The visibility of these parcels in some views means this land is not suitable for residential development. The severance of this land from the main village by the A367 limits development opportunities as there are limited opportunities for pedestrian connection back into the village.
- 7.26 The area to the south of the A367 provides an opportunity for a mobility hub, supporting and connecting with a network of transport interchange hubs to provide seamless, convenient, end-to-end mobility for longer journeys through the district by improving public transport accessibility.
- 7.27 The remaining land within the HELAA site is not considered appropriate for residential or employment development. However, the site is shown as being 'unconstrained' land within the RERAS. Therefore, there is scope to explore the possibility of using the land as a large scale solar PV installation subject to further assessment of landscape impact and mitigation.

7.28 Further to the east, adjacent to the hospital and existing employment site (and, therefore, taking advantage of the existing junction) there is an opportunity for suitably scaled industrial/commercial development. The current development is highly visible within the landscape and therefore any development here would need mitigation to screen the buildings from the surrounding landscape.



Figure 47: Indicative concept plan - Peasedown St John

Peasedown St John	Description
Opportunities	<p>Addition of up to 200 homes, of which an element would be affordable housing</p> <p>Expansion of Bath Business Park</p> <p>Renewable Energy from solar PV to the south of the village and improved grassland.</p> <p>A new Mobility Hub on the A367 to allow for on going public transport travel into Bath.</p> <p>Highway improvements to existing junctions.</p> <p>Quiet lanes and new roundabouts proposed by the Somer Valley Links project.</p>
Constraints	<p>Landscape character, Conservation Area, highways, Ancient Woodland, green space provision</p> <p>Secondary school pupils would need to be transported to Writhlington School in Radstock at cost to the Council, and would not be able to reach school using active modes.</p>
Mitigation required	<p>Landscape buffers, highway improvements, biodiversity net gain, planting, provision of on site green space and access to local food growing.</p>
Further evidence required	<p>Archaeological assessment, heritage assessment, confirmation of highway improvements, Landscape Visual Impact Assessment.</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Radstock

Place Profile

- 7.29 Radstock lies within the sunken valley of the Wellow Brook and is surrounded by hillsides, once used by operating collieries. Radstock Conservation Area is extensive, stretching from Lower Writhlington to incorporate elements of Westfield, described as one of England's best preserved coal mining towns and the reason for the Conservation Area designation. The Somerset Coal Canal first opened to support the coal industry which was superseded by the tramway in 1814, it was the role Radstock played as a railway logistics hub to the Somerset Coalfield which spurred expansion. By 1874, the town had two stations on separate lines, the first was the Great Western Railway (from Bristol to Frome via Radstock) and the second was the Somerset and Dorset Railway (from Bath to Poole via Radstock). This had implications for Radstock's morphology, which saw pockets of expansion focused on hillsides close to collieries and away from the heritage core. The town incorporates smaller settlements such as Clandown, Haydon and Writhlington which historically were separate villages.
- 7.30 The residential areas in the town are served by the town centre which provides a range of retail and other facilities and is proposed to be improved through the Radstock Town Centre Regeneration Action Plan. Other commercial areas are located to the east of the town centre in lowland areas beside Wellow Brook, and the town's sewerage facility is located further east. Coombe End which runs parallel to the A367 in the west, is an area which lacks formal structure comprising small commercial enterprises and residential housing, a former industrial rail line once passed nearby. The Radstock and Somerset Coalfield Museum is located centrally, and Radstock Town Football Club and Dragonfly Leisure are located towards the southern extent of the town, south of Frome Road. Surrounding Radstock Town Football Club there is a playing field and skate play area, and there are further small scale play areas in other areas of the town and allotments north of Springfield Crescent and south of Manor Road. Radstock has two primary schools and two secondary schools.
- 7.31 Radstock is served by bus services including on the A367 towards Peasedown St John and Bath. But to the south of Radstock areas such as Haydon and Writhlington public transport options are more limited.

Key Issues and Opportunities

- The pedestrian and cycle movement within Radstock town centre is severed due to the busy A367 which cuts through the centre and the highways layout is overly complex.
- Access to the waterfronts is limited within Radstock town centre.

- Radstock town centre has limited footfall due to the lack of diversity in retail offers, as well as a lack of an attractive food and beverage offer.
- There is a strong network of public rights of way and connections to the cycle path. Local residents would like to see access to the countryside improved.
- Public transport has been reduced in the Somer Valley with some areas having very limited access to bus services.
- The Conservation Area covers a large proportion of the town and the boundaries are being reviewed to possibly extend them.
- The town is surrounded by green hillsides which are integral to its landscape character.
- The town's mining heritage has shaped its landscape character.

Priorities and objectives

7.32 The following list sets out the key priorities and objectives for Radstock. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders

- New development should work with the Radstock Town Centre Regeneration Action Plan and help to increase footfall to the town centre.
- New development should complement relevant elements of the Somer Valley Rediscovered Project to provide greater opportunities for people to engage with and enable nature recovery.
- New development should provide a greater choice of transport via sustainable and active travel (walking, cycling, wheeling and public transport). New development can link into the existing public transport network allowing for buses to become more viable.
- Provide homes to meet the needs of the local area, including provision of homes that are affordable.
- Ensure built and natural environments promote health and wellbeing for all.

- Any additional population must be accommodated within existing schools. Writhlington School has limited capacity and additional development could have a negative impact. As such the cumulative impact of potential development sites on the secondary schools will need to be considered.

North Radstock

Context

- 7.33 Land immediately to the north of Radstock currently consists of agricultural fields, mostly on the plateau above the town. Bath Old Road, a historic route, runs through the area of search and has a few homes dotted along it. Trinity Church School sits at the southern edge with access to Woodborough Lane. The area is close to Radstock town centre in the south and is bordered by countryside to the north and east. The A367 runs along the western edge of the area of search with the small settlement of Clandown immediately beyond.
- 7.34 Landscape character is an important attribute in this area given that it sits above the rest of the town and forms part of the green setting of Radstock and the Conservation Area. The landscape and visual impacts of any new development would therefore need to be minimised and mitigated by integrating new development within a robust landscape planting framework and ensuring it blends in with the existing hillside that continue to provide a green setting for Radstock..
- 7.35 A single Scheduled Ancient Monument lies to the north-west of the area, comprising Camerton Romano-British town and associated prehistoric and early medieval monuments. As a consequence of the close proximity to the Scheduled Monument there is some potential for previously unrecorded remains to be present within the area of search, although the part of the area closest to the Scheduled Ancient Monument was subject to landfill and any former archaeological remains would have been removed. There is no record of any remains having been reported during those works.
- 7.36 Bath Old Road appears to be used as a 'rat run' and speed is only limited in the built up areas to the south. There is currently no pavement access to and through parts of the area.. Existing walking, cycling and wheeling connections into the town centre and to Trinity Primary School are poor. Any new development would require and could deliver significant improvements to these connections..

7.37 Works to Bath Old Road to provide a Quiet Lane could help to facilitate active travel. The speed limit would need to be reduced and a new pavement provided giving better pedestrian access into the town centre. Trinity School has room to expand and vehicular access to the school could be improved, for example by providing an additional access from the north. New vehicular access onto the A367 would be needed so that any development is not accessed solely from Bath Old Road and to ensure there is direct access to nearby bus stops.



Figure 48: Context Plan - North Radstock

Site Options

- 7.38 Site options are presented below that could provide up to 1,000 new homes in total, as well as supporting facilities and green infrastructure. The site options have the potential to create a new neighbourhood with a connection to the A367 and direct access to Radstock town centre via the Bath Old Road. It is a residential and landscape led development with green screening to the north and south and a tree-lined street running through the middle of the development creating a sense of place when arriving at the new neighbourhood and contributing to the landscape setting.
- 7.39 Other green links to the countryside will run north-south through the development to create biodiversity links, support habitat improvement, provide views to the countryside and improve the connectivity within the neighbourhood.
- 7.40 The proximity of the development to Radstock town centre will benefit the regeneration strategy for the town centre and should help to increase footfall. Creating a critical mass of residents with easy access to current and new facilities would help the town centre to thrive. The town centre's regeneration will benefit from future public realm improvements focussing on pedestrian safety and accessibility.
- 7.41 The existing school is close to the proposed local centre, and with good pedestrian links between these facilities. The school will have a direct link to Clandown providing better access on foot for residents, and the school site can be extended to allow for potential future growth in the school age population in Radstock.

Option A

- 7.42 The development will extend to the west of the Bath Old Road, with a direct link to Radstock town centre along both the existing Public Rights of Way and routes through the new development. Development is stepped away from the Bath Old Road to preserve its characteristic far-reaching views towards Radstock to the south and open countryside to the north.
- 7.43 Vehicle access to the development areas can be provided to connect onto the A367 via the Option 1 development area. Bath Old Road could become emergency access only, and will be a key active travel link between the development and Radstock Town Centre, and north to Peasedown St John and the mobility hub.



Figure 49: Indicative concept plan - North Radstock Option 1

North Radstock Option A	Description
Opportunities	<p>Approximately 400 homes, of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>Improved access to Trinity School.</p> <p>Improved access to the countryside and surrounding public rights of way.</p> <p>Green Space Provision and Allotments</p> <p>Connections to the 174 bus along the A367</p>
Constraints	<p>Hillside location with landscape value and close to the Conservation Area.</p> <p>Bath Old Road is used as a rat run and does not have pavement access.</p> <p>Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument.</p> <p>Safeguarded existing sport and recreational facilities (Roundhill Recreational Ground)</p>
Mitigation required	<p>Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing) Mitigation if Roundhill Recreation Ground is lost.</p>
Further evidence required	<p>Archaeological assessment.</p> <p>Detailed Landscape Assessment</p> <p>Heritage Assessment</p>

Option B

- 7.44 In addition to option 1, in this option would extend development to the east of Bath Old Road with open space along the north of the residential parcels wrapping around to the east to connect to a new central green space. Located close to the new local centre, the new green space is positioned to maximise accessibility.
- 7.45 A greater quantum of development allows for additional facilities such as a local centre.



North Radstock – Option B	Description
Opportunities	<p>Approximately 600 homes, of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>A larger quantum of development can provide new community facilities.</p> <p>Improved access to Trinity School.</p> <p>Improved access to the countryside</p> <p>Green Space Provision and Allotments</p> <p>New local centre</p> <p>Connections to the 174 bus along the A367</p>
Constraints	<p>Hillside location with landscape value and close to the Conservation Area.</p> <p>Bath Old Road is used as a rat run and does not have pavement access.</p> <p>Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument.</p> <p>Proximity to the Conservation Area</p>
Mitigation required	<p>Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing) Mitigation if Roundhill Recreation Ground is lost.</p>
Further evidence required	<p>Archaeological assessment</p> <p>Detailed landscape assessment</p> <p>Heritage Assessment</p>

Option C

7.46 In addition to option A and B development proposed is maximised under this option to provide a total of around 1,000 homes. A tree belt within the open space to the east, will help absorb the development in long distance views from the east.

7.47 There is a strategic green infrastructure opportunity on the slopes to the east of the site.



Figure 51: Indicative concept plan - North Radstock Option 3

North Radstock – Option C	Description
Opportunities	<p>Approximately 1,000 houses of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>A larger quantum of development can provide new community facilities.</p> <p>Improved access to Trinity School.</p> <p>Improved access to the countryside and. strategic green infrastructure opportunities.</p> <p>Green Space Provision and Allotments</p> <p>New local centre</p> <p>Connections to the 174 bus along the A367</p>
Constraints	<p>Hillside location with landscape value and close to the Conservation Area.</p> <p>Bath Old Road is used as a rat run and does not have pavement access.</p> <p>Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument.</p> <p>Proximity to the Conservation Area</p>
Mitigation required	<p>Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing). Retention of Roundhill Recreation Ground.</p>
Further evidence required	<p>Archaeological assessment.</p> <p>Detailed landscape assessment</p> <p>Heritage Assessment</p>

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

East Radstock

Context

- 7.48 The area sits within the existing landscape comprising agricultural fields, enclosed by the valley to the northeast, which forms part of the Wellow Brook valley to the north. To the south of the valley, the landform rises to form a shallow plateau, centred along Green Parlour Road.
- 7.49 The A362 runs through the area providing vehicular access to both the northern and southern parts of the locality. Development of this area would be an expansion of Writhlington.
- 7.50 New development would generate the need for new and improved links to the town centre and to the surrounding countryside. The existing five-way junction at Frome Road, Old Road and Manor Road is heavily congested at peak times. In particular, there are schools and associated traffic either side of the junction. Development would require and could help facilitate improvements to the existing junction, which would provide better access to and within the area also better supporting a local centre. In order to enable development and in addition to improving the existing five-way junction, a new junction would need to be created to relieve pressure on the existing five-way junction. Manor Road is currently used as a 'rat run' to access Peasedown St John. Braysdown Lane which connects to Manor Road is proposed to be designated as a quiet lane which may help reduce use of Manor Road by cars.
- 7.51 There are limited public transport connections into the town centre therefore, currently people without a car struggle to access services. The potential to improve public transport connections associated with any development would also need to be explored.
- 7.52 The area is surrounded by gently rolling, open countryside, easily accessible by existing lanes and new and improved connections. Nearby ancient woodlands would be a natural edge to the development and these areas of planting could be expanded by the creation of a buffer zone, which would provide protection for the ancient woodland and improve biodiversity.
- 7.53 The area is located at the edge of a rolling and indented plateau with the steep sided valley of the Wellow Brook immediately to the north. It occupies an elevated position on the skyline. It is therefore important that any development retains a green landscape setting of the wider Writhlington area. The existing network of hedgerows, along field boundaries and roads, would also need to be strengthened and new open spaces created to form a landscape setting for any new development. New landscape planting would be needed to soften the visual impact of development. There are also walking connections of paths and lanes into the countryside and scope for more and improved connections.

7.54 Any future development would need to be on land within both B&NES and Somerset Council administrative areas in order to provide a quantum of development necessary to facilitate provision of shops, services and improvements to the road network. This requires ongoing dialogue between the two Councils regarding the potential for future development. If development were to be progressed the two councils would also then need to co-operate on their respective Local Plans and work together on preparing a placemaking strategy to facilitate creation of a high quality, sustainable and healthy development well connected to the rest of Radstock and the surrounding area. In addition, the councils would need to liaise on identifying infrastructure requirements and funding arrangements including developer contributions.

7.55 The area of search east of Radstock has the potential to support a reasonably large scale residential-led development, which would also deliver open space, social infrastructure, nature recovery and improved local facilities over the Plan period. Development of this scale and in this location would also support regeneration efforts in the local town centres.



Figure 52: Context plan - East Radstock

Site Options

- 7.56 Development in this location could provide up to 1,000 homes (although an option for a lesser amount of development is also set out below). If the site is to be developed then the quantum of the development must be viable to allow for and help deliver junction improvements along the A362.
- 7.57 The vehicular access will be directly off the A362 and the Old Road will be transformed to active travel modes and local vehicular access only.
- 7.58 The new development would be located partially on the shallow plateau, with existing hedgerows strengthened and new planting established along key access roads and the new footpath and cycleway network, to help integrate the development into the landscape and in views from the east.
- 7.59 The nearest bus services are located in Radstock town centre, although there may be potential to extend services if critical mass can be achieved, where a Mobility Hub is proposed to facilitate interchange between modes.
- 7.60 Vehicle access would be provided from routes which provide connections to the A362 and Old Road. To the north, the A362 connects to Radstock town centre and surrounding residential areas. Old Road provides an additional route to Radstock town centre. Access points for active modes can also be provided to both of these routes. Providing a vehicular access onto the A362 offers the potential to reduce the number of traffic movements at the nearby five-ways junction, which could reduce safety and congestion issues.
- 7.61 A larger development might provide the opportunity to deliver better supporting facilities. Providing supporting facilities offers the potential to improve access to amenities for the local population, reducing distances that people need to travel.

Option A

7.62 Option A would provide 550 homes, along with junction improvements.

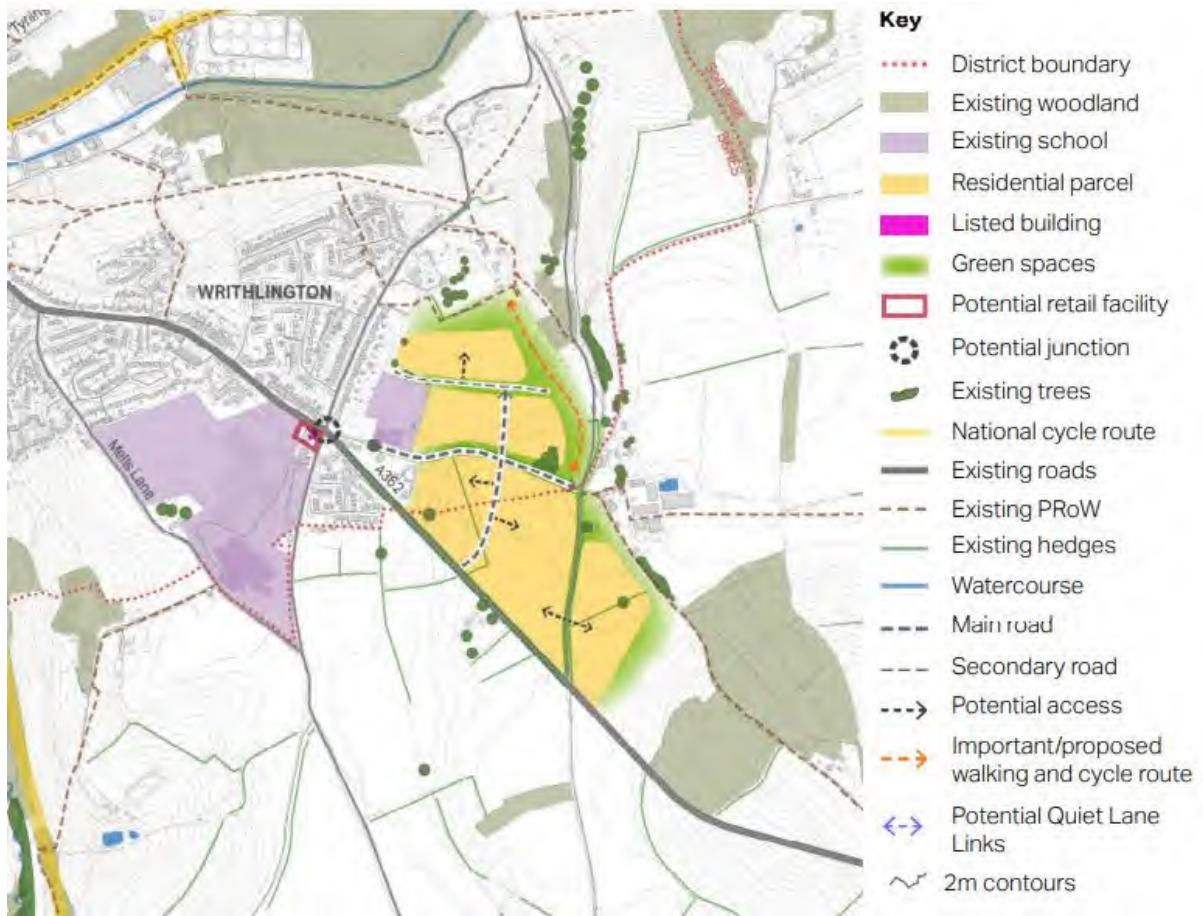


Figure 53: Indicative concept plan - East Radstock Option A

East Radstock – Option A	Description
Opportunities	<p>Addition of up to 550 homes, encompassing an element of affordable housing.</p> <p>New community and recreation facilities.</p> <p>Improvements to existing road junctions.</p> <p>Improve access to the countryside</p>
Constraints	<p>The landscape setting of the existing site.</p> <p>Existing traffic congestion.</p> <p>Cumulative impact on school places</p>
Mitigation required	<p>Additional traffic junction to ease congestion</p> <p>Landscaping</p> <p>Community facilities</p>
Further evidence required	<p>Landscape plan, ecological assessment, highways and traffic assessment</p>

Option B

7.63 Option B would almost double the development potential from option 1. Development is extended to the south with the option to provide new recreation facilities. There would be a further road connection onto Knobsbury Lane.



Figure 54: Indicative concept plan - East Radstock Option B

East Radstock – Option B	Description
Opportunities	<p>Provide up to 1,000 homes, encompassing an element of affordable housing.</p> <p>New community and recreation facilities.</p> <p>Improvements to existing road junctions.</p> <p>Improve access to the countryside</p>
Constraints	<p>The landscape setting of the existing site.</p> <p>Existing traffic congestion.</p> <p>Cumulative impact on school places</p> <p>Knobsbury Lane is an important skyline view and would require significant landscape buffering</p>
Mitigation required	<p>Additional traffic junction to ease congestion</p> <p>Landscaping</p> <p>Community facilities</p>
Further evidence required	<p>Landscape plan, ecological assessment, highways and traffic assessment</p>

Do you prefer option A or option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

West of the Enterprise Zone

Place Profile

- 7.64 The area west of the land allocated for the Somer Valley Enterprise Zone is currently an agricultural field with overhead power lines running across it. While the power lines prohibit other forms of development, the openness and size of the parcel provides an opportunity for developing solar PV at a scale supported by habitat improvement. The adjacent enterprise zone allocation will be a good neighbour to an energy generation facility. The site is classed as being unconstrained land within the RERAS.
- 7.65 Wellow Brook is a natural edge to any potential development to the south and can be part of an enhanced green infrastructure network. There is an opportunity to create a recreational route along Wellow Brook providing access to the wider area.



Figure 55: Context plan - West of the Enterprise Zone

Key Issues

- Impact of renewable energy on the surrounding landscape. The proposed PV panels will need to be designed and sited so as to best integrate with the surrounding landscape.
- Transport connections between Midsomer Norton and Farrington Gurney
- Within the context of the climate emergency and spatial priorities of the Local Plan there is a requirement within B&NES to provide renewable energy as the current target is not being met.
- Comprehensive landscaping and nature recovery plan
- Connections to walking and cycling routes

Site Option

- 7.66 The proposal for this area is to develop the land on both sides of the A362 for renewable energy generation (solar PV). Development of this sort is in keeping with the priority to facilitate opportunities for renewable energy generation to help B&NES become carbon neutral and nature positive by 2030, and work towards becoming a climate resilient district. The solar PV would need to integrate with the existing landscape character and improve biodiversity and habitats.
- 7.67 The solar PV would be located within the existing network of hedgerows and tree belts along the disused railway line and the Wellow Brook. These should be strengthened to fill gaps in hedgerows and help integrate the solar panels into the landscape, making them less obvious in views from existing roads and Public Rights of Way.



Figure 56: Indicative concept plan - West of the Enterprise Zone

West of the Somer Valley Enterprise Zone	Description
Opportunities	<p>Walking and Cycling connections between Midsomer Norton and Farrington Gurney.</p> <p>Provision of renewable energy to help meet the council's renewable energy targets.</p>
Constraints	<p>Landscape sensitivity.</p> <p>Adjacent to Wellow Brook</p> <p>Access to the A362.</p>
Mitigation required	<p>Landscaping plan</p> <p>Buffer to nearby SNCI at Wellow Brook</p>
Further evidence required	<p>Information on Grid Capacity</p> <p>Landscape Visual Impact Assessment</p>

Question: Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Farrington Gurney

Place Profile

- 7.68 Farrington Gurney sits on the junction of the A37 and A362 and has good access to the surrounding towns and cities. The village already supports a variety of facilities including a school, pub, restaurant and a community facility.
- 7.69 The Somer Valley links project and Somer Valley Enterprise Zone will provide an off road cycle path into Midsomer Norton. The Somer Valley links project proposes a new mobility hub at Farrington Gurney.
- 7.70 Historically, the development of the village has moved away from St John's Church, which is a listed building and now stands on its own in fields to the east of the village. The setting of the church will be an important consideration for any development proposals.
- 7.71 Farrington Gurney is surrounded by rolling, relatively flat countryside. The gentle escarpment to the south creates a boundary for any proposed development. The Nature Reserve at Hollow Marsh and countryside are accessible via local Public Rights of Way.
- 7.72 The main constraint is that almost all of the land within the area of search is classified as Grade 1 in the Agricultural Land Classification, and land adjacent, to the south, is classified as Grade 3a. Grade 1 and 3a, are referred to as 'best and most versatile' land, where development should be avoided.
- 7.73 There are opportunities for a good size residential and landscape-led development. The new mobility hub along the A37 would help to achieve a net zero carbon development, and active travel is promoted throughout the development.
- 7.74 To improve walking, cycling and wheeling permeability throughout the village, the existing main roads need to be downgraded and vehicle speeds need to be reduced to provide improved pedestrian safety. Where possible, the existing pedestrian and cycle routes need to be improved and widened. A thorough archaeological investigation would be needed as part of the planning and development process.
- 7.75 There is an Air Quality Management Area within Farrington Gurney at the junction of the A37 and A362. The area is expected to become compliant at the end of 2023 and the latest monitoring data on air quality is awaited. However, an increase in development to the village may impact on air quality and any new development may need to contribute financial contributions to manage air quality.



Figure 57: Context Plan - Farrington Gurney

Key Issues

- Setting of the existing Grade II listed church.
- Setting of the surrounding landscape.
- Impact of development on the existing highway network and access to public transport
- Impact on the Farrington Gurney Air Quality Management Area (AQMA)
- Lack of housing that is affordable.
- Secondary age pupils from any new development at Farrington Gurney will need to be transported to Norton Hill School in Midsomer Norton, at cost to the Council. These pupils will not be able to travel to school sustainably by active modes.

Priorities and Objectives

- 7.76 The following list sets out the key priorities and objectives for Farrington Gurney. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.
- Around 500 homes could be provided, including housing that is affordable and meets local needs
 - The existing primary school is full, with no room to expand. Therefore, a new school would need to be provided which influences the scale or quantum of development required.
 - Opportunities to improve local services and facilities.
 - There is an opportunity to connect to the Somer Valley links project which along with the Somer Valley Enterprise Zone will provide an off-road cycle link to Midsomer Norton. This will provide cycle connection to the network in Midsomer Norton.
 - Landscape mitigation would be required to soften the impact of the development.
 - Ensure any new development provides mitigation measures so as not to cause harm to the Air Quality Management Area.

Site Options

- 7.77 The development options would have vehicular access off the A37, which needs to be downgraded (e.g. speeds reduced) as it passes through the village, in order that safe pedestrian and cycle routes and crossings can be provided.
- 7.78 Green links throughout the residential areas would enhance local biodiversity and provide a high-quality public realm and direct access to the countryside.
- 7.79 The new development needs to be respectful of the historic character of the village when it comes to connecting to the existing settlement. Historic routes could be used for active travel, and it is important to retain and enhance the local character of the settlement. The setting of the Grade II listed church is an important consideration and would require a sensitive solution.

Option A

- 7.80 The development provides a series of green corridors along existing roads and Public Rights of Way, with the enclosing green buffer to the north and east forming a network of open spaces accessible by a system of footpaths and cycleways.
- 7.81 A new bus route along the A362 would connect with the existing bus services on the A37 corridor, via a new Mobility Hub located at the junction of the A362 / A37. Bus priority at the A37 / A362 junction will enhance bus journey times.
- 7.82 Pedestrian space improvements are proposed along the A37 corridor through Farrington Gurney, comprised of wider footways, a review of pedestrian crossings and signals and a reduction in the speed limit.
- 7.83 Church Lane could be closed to traffic to improve the north-south pedestrian and cycle links to the existing Farrington Gurney Church of England Primary School.
- 7.84 Two Quiet Lane Links have been identified running in an east-west alignment on unnamed rural roads to the north of Farrington Gurney.

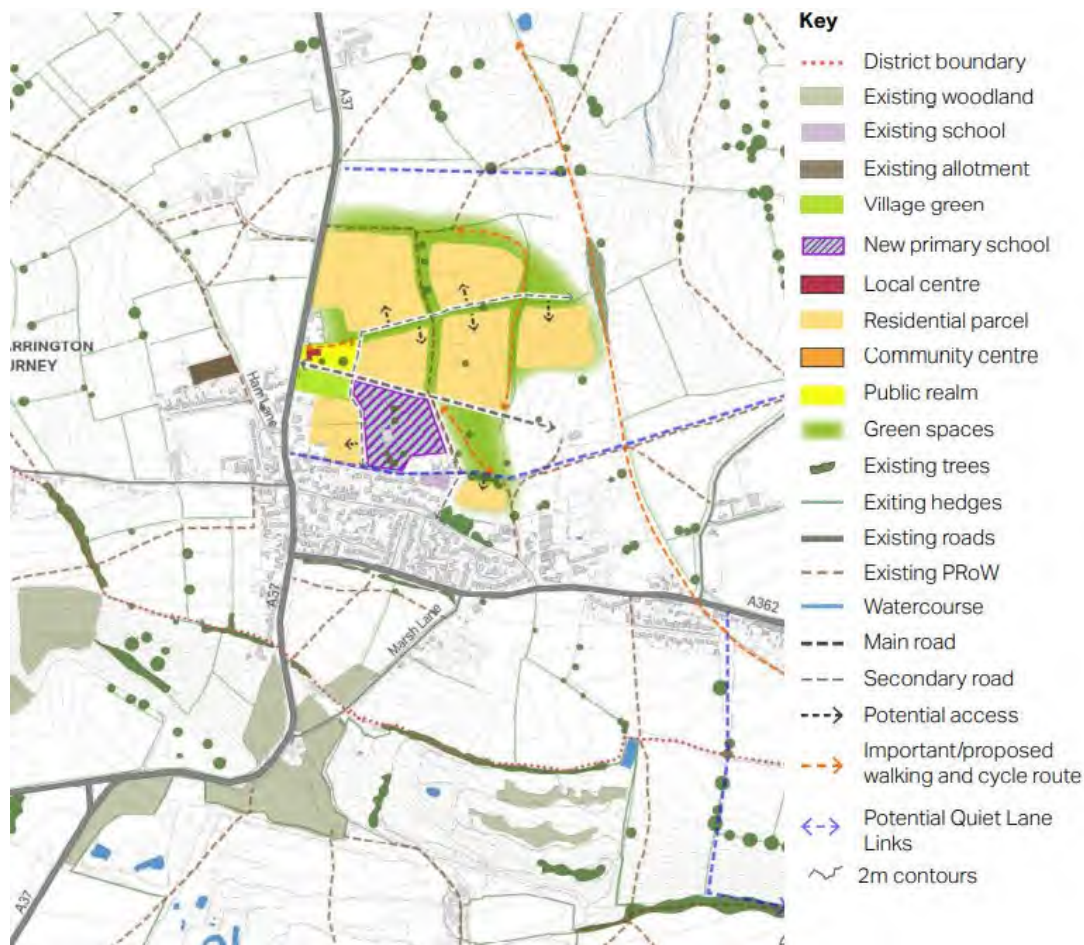


Figure 58: Indicative concept plan - Farrington Gurney Option A

Farrington Gurney (north) - Option A	Description
Opportunities	Provision of approximately 500 homes, an element of which would be affordable housing.
Constraints	<p>Setting of the listed church requires sensitive treatment</p> <p>Air Quality Management Area</p> <p>Primary school capacity</p> <p>Agricultural land classification</p> <p>Recreation ground – safeguarded existing sport and recreational facilities. The Recreation Ground is also designated as a Local Green Space.</p> <p>Secondary school pupils would need to be transported to Norton Hill School in Midsomer Norton at cost to the Council, and would not be able to reach school using active modes.</p>
Mitigation required	<p>New primary school</p> <p>Landscaping</p> <p>Highway works</p> <p>Provision of on-site green space (including park and recreation ground)</p>
Further evidence required	<p>Heritage assessment</p> <p>Archaeology investigation</p> <p>Landscape Assessment</p>

Option B

- 7.85 Option B is a residential development to the south of the A362, with vehicular access off this main road.
- 7.86 The existing road running through the site (Marsh Lane) would become an important connecting route, providing access to the main body of development. There will be additional green links and active travel routes connecting to the existing village and, in particular to the various amenities and services, such as the school and the Co-op.
- 7.87 Residential parcels would be located within a series of green corridors and buffers to protect the Site of Nature Conservation Interest in the centre of the area and Rush Hill Wood, an Ancient Woodland to the south. Marsh Lane which connects the two areas of woodland is identified as a Nature Recovery Network opportunity for woodland connectivity. The buffer along the southern boundary also helps protect the setting of the Grade II registered park and garden of Ston Easton Park to the south.
- 7.88 Planting along the A362, which runs between the existing settlement and the new development would help to integrate it into the settlement, framing views towards the ridge to the south and to key buildings within the existing settlement.
- 7.89 There would be a need for pedestrian improvements along the A362, which provides access for vehicles and active travel modes to the development. The Somer Valley Links proposes an active travel route along the road to connect with active travel links in Midsomer Norton.



Figure 59 Indicative concept plan - Farrington Gurney Option B

Farrington Gurney (south) - Option B	Description
Opportunities	Approximately 500 homes of which an element would be Affordable Housing
Constraints	Site of Nature Conservation Importance Ancient Woodland Mendip Hills Agricultural Land Classification Air Quality Management Area
Mitigation required	New primary School Highway improvement on the A362 Landscape buffer to ancient woodland and SNCI Secondary school pupils would need to be transported to Norton Hill School in Midsomer Norton at cost to the Council, and would not be able to reach school using active modes.
Further evidence required	Archaeological assessment Landscape Assessment

Do you prefer Option A or Option B?
Please explain the reasons for your opinion on these options
Can you suggest alternatives that you think we should consider?

Non-strategic Sites

7.90 Through the call for sites and HELAA process a number of smaller, non-strategic or more local sites have been promoted. These sites will not individually provide a strategic quantum of development, but could still contribute a useful role in meeting the overall housing requirement.

Option to allocate smaller sites for housing within the Somer Valley	Option	Opportunities	Constraints
A	Only allocate strategic sites where the quantum of development can support and deliver site specific infrastructure and services.	All new strategic development sites will provide new infrastructure and services.	May miss opportunities for smaller sites to contribute to the housing requirement.
B	In addition to the allocation of strategic sites, allocate smaller local sites for housing.	<p>Cumulatively smaller sites will contribute to the meeting the housing requirement.</p> <p>It will be possible to secure contributions to infrastructure improvements.</p>	<p>The sites will not be of a size to trigger the provision of site specific infrastructure and services.</p> <p>Piecemeal development does not look at the area as a whole and makes it more difficult to secure co-ordinated infrastructure provision/improvements.</p>

Potential smaller site allocations

7.91 The map below shows sites that have been promoted through the HELAA process that are assessed as being suitable, available and achievable and therefore, could potentially be allocated for development. Site boundaries have not been indicated as they would be defined as part of site allocation in the Draft Local Plan, along with setting the site requirements. This is a set of options and a decision regarding allocation will be made at the Draft Local Plan stage. Likewise, during the options consultation further sites may be promoted for housing development that will be considered. Sites below are referenced using their HELAA number and set out in the table below is a summary of the main opportunities and constraints related to each site



Figure 60: Map showing location of potential smaller site allocations

**Do you prefer Option A or Option B?
Please explain the reasons for your opinion on these options**

Can you suggest alternatives that you think we should consider?

RAD 31c

7.92 The site is located to the north east of Haydon village, sitting on a plateau above Radstock Town Centre. To the north of the site is a Regionally Important Geological Site and Site of Special Scientific Interest.

Option	Opportunities	Constraints
RAD 31C	<p>Infill development following the contours of the existing settlement.</p> <p>Opportunity for nature recovery.</p> <p>Existing infrastructure can be used.</p>	<p>No public transport.</p> <p>Environmentally sensitive location.</p>

Question: Do you support development at Haydon village? Please provide reasoning.

WF01

7.93 The site is located on the southern edge of Westfield. It sits adjacent to the existing Westfield industrial estate. There is currently no pavement access to the main road and the site accommodates an existing stream that flows into waterside valley.

Option	Opportunities	Constraints
WF01C	Development could facilitate new pavements and lower traffic speed limits.	<p>The presence of the stream will make it difficult to develop.</p> <p>There is no pavement access to the main road.</p> <p>The site is cut off from shops and services.</p> <p>Access would need to go through a busy industrial site. Development of this land might be more suitable for industrial/employment purposes.</p> <p>Visual impact of the development on the wider landscape.</p>

Question: Do you support development at south Westfield? Please provide reasoning.

MSN28a and b

7.94 The sites are located on the southern edge of Midsomer Norton adjacent to existing housing estates. The current pavement access ends adjacent to the site.

Option	Opportunities	Constraints
MSN28 a and b	<p>Extension to existing residential development.</p> <p>Development could facilitate new pavements and lower traffic speed limits.</p>	<p>The site is not close to local shops and services.</p> <p>Unsustainable location.</p>

Question: Do you support development to the south of Midsomer Norton? Please provide reasoning.

MSN23 and PAU 24a

7.95 The sites are located on the western edge of Midsomer Norton close to the Tesco store at Old Mills. MSN23 is a sloping site that sits close to the valley floor. PAU 24a is a plateau site adjacent to Tesco that slopes down toward the valley.

Option	Opportunities	Constraints
MSN 23 and PAU 24a	<p>Infill gaps within existing development.</p> <p>Opportunity for better pedestrian connections between Tesco and Midsomer Norton.</p>	<p>Due to land ownership this will result in piecemeal development and there is limited opportunity for cohesive design.</p>

Question: Do you support development to the west of Midsomer Norton? Please provide reasoning.

PAU 11 and 12

7.96 The sites sit close to Farrington Road. PAU 12 sits to the north of Farrington Road adjacent to Westview and Downsway. It is a relatively flat site. PAU 11 is accessed from Abbots Farm Close and slopes upwards to the south.

Option	Opportunities	Constraints
PAU 11 and 12	Opportunity for small scale additional housing.	Due to the location of the site development would likely be characterised by cul-de-sacs with little connectivity to the surrounding settlement. Impact on the existing landscape.

**Question: Do you support development at south west Paulton?
Please provide reasoning.**

8 Rural Areas: Vision, Strategy and Options

Strategy Overview and Key Issues

- 8.1 Home to over 37,000 residents, rural B&NES is a diverse group of towns, villages, and hamlets with distinct characteristics and landscapes which accounts for over 90% of the district's land area. Each settlement has their own strengths and challenges. Traditionally the rural economy has been based on farming, self-employment and small businesses, which without the right support limits growth potential. Poor public transport and digital connectivity also act as barriers to business and home working, contributing to social isolation and unequal access to essential goods and services. 78% of rural residents commute to work by car, and alongside high transport emissions, highlights the need for more local employment and sustainable travel options for our rural communities.
- 8.2 In 2022, house prices in B&NES were more than 10 times annual median average earnings, creating challenges across the district. The lack of affordable housing in our rural communities threatens the vitality of local businesses and the social sustainability of our towns and villages.

Place Profile

- 8.3 Set amongst high quality natural environments, the villages and hamlets of the rural areas of the district provide an attractive and often peaceful environment in which to live and work. The economy of the rural areas is grounded in agriculture, which now works alongside other small rural businesses. The high-quality landscape, of varying characters, contributes to the quality of life of the district's residents, as well as attracting visitors and as a place for leisure and relaxation.
- 8.4 Large parts of the rural areas are designated as Green Belt, and much are within the Cotswolds or Mendip Hills National Landscapes. The rural areas complement the more urban parts of the district, and many rural residents look to these urban areas for a wider range of facilities and employment.
- 8.5 The current approach to rural development, as delineated in the Placemaking Plan and Core Strategy, categorises our villages as follows:
- **RA1 Villages:** Non-Green Belt villages boasting primary schools and, crucially, at least two of the following essential amenities within the village - a post office, community meeting space, and convenience store. Furthermore, they benefit from at least a daily Monday-Saturday public transport service to major centres. Policy RA1 required allocation of sites to deliver around 50 dwellings in each village.

- **RA2 Villages:** Non-Green Belt villages that fall outside the RA1 scope, characterised by site allocations to deliver around 10-15 dwellings in each village.
- **GB2 Villages:** Villages washed over by the Green Belt, where development is restricted to infill only.

Key Issues

- 8.6 It is becoming increasingly evident that the current strategy is leading to the relative dispersal of development across a wide range of settlements. This is an unintended consequence of the approach outlined above and has led to a number of issues this Local Plan needs to address.
- 8.7 Many of these issues have been picked up from feedback received to the Launch Consultation and Phase 1 Workshops:
- Lack of affordable housing to meet local needs that may impact on the social sustainability of the rural areas and exacerbate difficulties for an ageing population.
 - For much of the rural area poor access to public transport affects the functionality of the rural economy and leads to isolation for those without access to private transport.
 - Access to community and social facilities, services and shops.
 - Importance of maintaining and enhancing the character and local identity of our rural areas and communities.
 - Reliance of the rural economy based on farming, the self-employed and small businesses that require support to flourish.
 - Potential opportunities to diversify the rural economy e.g. centred around local food production, sustainable rural and eco-tourism, renewable energy, or the natural resources sector.
- 8.8 Some of these issues can be addressed through development, either Local Plan-led or by communities through Neighbourhood Plans. However, there are some issues that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- 8.9 The Government has also announced its commitment to [Unleashing rural opportunity](#), these include ways in which the planning system can enable the rural economy to grow. Through this the Government has consulted on possible changes to permitted development rights which support agricultural development and rural diversification. This will look at changes to the current rules to make agricultural development more flexible for farmers so they can improve their existing agricultural buildings to make them more productive. The paper also outlines the ways in which the Government is seeking to support the building of more homes for local people to buy where local communities want them.
- 8.10 The council's Economic Strategy is also seeking to support the diversification of the rural economy and realising opportunities to facilitate moves towards a greener economy, including growth in environmental services and natural resources sectors, as well as sustainable rural and eco-tourism. Improvements in digital infrastructure and changing work practices also creates opportunities to diversify and enhance the rural economy. A stronger rural economy, providing opportunities for local residents to access good jobs, is a vital component of more sustainable rural communities, alongside efforts to retain and improve local services and facilities.

Proportionate Growth:

- 8.11 Central to these issues is the need for proportionality to growth, ensuring that development aligns with the unique characteristics and needs of individual communities. Without a deliberate focus on proportionality, development can risk overburdening smaller villages or inadequately serving larger ones.
- 8.12 These challenges underline the necessity for a more adaptable and nuanced approach to rural development, which not only empowers local communities but also ensures that development is commensurate with the distinct needs and characteristics of our rural villages and settlements. It is with these considerations in mind that the Rural Strategy introduces the two complementary pathways to address these issues while fostering sustainable growth and development.

Pathway 1: Community-Led Growth

- 8.13 Under this pathway, local communities take the lead in shaping and advancing their growth initiatives. Emphasising community involvement, this approach offers a flexible framework, enabling residents to propose growth projects that align with their local aspirations. Using a range of tools, including rural exception schemes, community land trusts, and Neighbourhood Planning, empowering communities to initiate growth projects.

Pathway 2: Local Plan-Led Growth

- 8.14 As communities contemplate the pursuit of their growth proposals, it is essential to maintain efforts in preparing the new Local Plan to ensure the certainty of delivering new developments, especially housing and employment opportunities.
- 8.15 Taking these steps is vital to:
- Positively plan and reduce the possibility of speculative developments.
 - Facilitate the development of new affordable, market, and specialised housing to meet the needs of rural communities.
 - Support existing services and facilities.
- 8.16 In opting for a Local Plan-led/site allocation approach to rural growth and development, there are several inherent benefits that prioritise the holistic well-being of our villages. Unlike speculative large site development, which can introduce unforeseen challenges for essential functions like schools, transport, and community facilities, a Local Plan provides a structured and comprehensive framework.
- 8.17 Pathway 2 focuses on a Local Plan-led approach that provides a clear direction for growth and change, adhering to the NPPF's principles of sustainable development. This approach is essential in helping to meet our overall housing, job, and infrastructure requirements and provides certainty for both communities and developers. The principle of "proportionality" is central to this approach, ensuring that growth aligns with the unique needs and character of each community.
- 8.18 Pathway 2 focuses on guiding new development in rural areas by identifying relatively sustainable villages. Instead of adhering to the rigid distinctions of RA1 and RA2 villages, a more flexible and proportionate approach will be taken.
- 8.19 The strategy for rural growth is based on an assessment of a village's sustainability, considering factors such as connectivity through sustainable modes of transportation (public transport, walking, cycling and wheeling) and the availability of essential services and facilities.
- 8.20 In conjunction with this approach, place profiles have been prepared for our villages and parishes. These profiles incorporate an analysis of past growth since the start of the Core Strategy plan period, demographics, connectivity, facilities audit, and other key issues. The outputs of this work are outlined in a Topic Paper (published alongside the Options document) and the associated identification of relatively sustainable villages for consideration are set out in the Options document.

- 8.21 Options are set out below showing the relatively sustainable villages and what proportionate growth nominally of 5% over the plan period could mean in terms of additional housing numbers, based on the number of dwellings existing in the village. There are also options relating to growth either being focused at the most sustainable of these villages (highlighted in bold) or across all of the identified villages.
- 8.22 The villages identified as relatively sustainable compared to others are proposed to become the focus of attention for some rural growth. Our commitment is to engage with the community and parish council in these villages to explore the potential for modest growth, its location and the associated benefits that such development could bring e.g. meeting local housing needs or providing employment opportunities, helping to keep villages viable and sustainable. This modest development would be on large sites that would then be allocated for development in the Draft Local Plan and would be additional to any small windfall sites (often sites for one or two dwellings) that might come forward within the Housing Development Boundary for each village. Opportunities outlined in the Housing and Economic Land Availability Assessment (HELAA) will be considered as a starting point for potential locations while also working closely with community representatives as the plan progresses to ensure that any development aligns with their aspirations while preserving the distinct character and vitality of each rural area.
- 8.23 It should be noted that Options relating to the villages of Saltford, Whitchurch, Farrington Gurney, Paulton and Peasedown St John are being addressed in the Place Based sections of this document.
- 8.24 Should other villages wish to be considered for further growth then there is the opportunity for them to respond through this consultation.
- 8.25 The Council is also considering the potential for a new settlement to the south of Burnett, adjacent to the A39. It is proposed that this site is consulted on as a longer term option in the options document, with the potential to provide housing, employment space, and other uses, outside of the Local Plan period.

Village Options

- 8.26 Village options are set out in the table below:

Village	5% Growth	Opportunities	Constraints
Bathampton	40 dwellings over the Plan Period	<p>High connectivity score</p> <p>Broad range of services & facilities</p>	<p>Village excluded from but surrounded by the Green Belt and within the Cotswolds National Landscape. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt.</p> <p>Within indicative extent of the setting of the World Heritage Site</p> <p>Limited Primary School capacity</p>
Batheaston	63 dwellings over the Plan Period	<p>High connectivity score</p> <p>Broad range of services & facilities</p>	<p>Village excluded from but surrounded by the Green Belt and within the Cotswolds National Landscape. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt.</p> <p>Within indicative extent of the setting of the World Heritage Site</p> <p>Limited Primary School capacity</p>

Bathford	40 dwellings over the Plan Period	<p>High connectivity score</p> <p>Moderate range of services & facilities</p> <p>Some Primary School capacity identified</p>	<p>Village inset from the Green Belt and lies within the Cotswolds National Landscape. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt.</p> <p>Within indicative extent of the setting of the World Heritage Site</p>
Chew Magna	28 dwellings over the Plan Period	<p>Broad range of services & facilities</p>	<p>Low connectivity score</p> <p>Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site(s) for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt.</p> <p>Limited Primary School capacity</p>
Chew Stoke	21 dwellings over the Plan Period	<p>Moderate range of services & facilities</p>	<p>Low connectivity score</p> <p>Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site(s) for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt.</p> <p>Limited Primary School capacity</p>

Clutton	35 dwellings over the Plan Period	Moderate connectivity score Some Primary School capacity identified	Limited range of services & facilities The northern edge of the village is in the Green Belt
Corston	11 dwellings over the Plan Period	Moderate connectivity score	Limited range of services & facilities Within indicative extent of the setting of the World Heritage Site No Primary School Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt.
Farmborough	28 dwellings over the Plan Period	Moderate connectivity score Moderate range of services & facilities	Village inset from the Green Belt. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt. Limited Primary School capacity

Freshford	15 dwellings over the Plan Period	High connectivity score Moderate range of services & facilities	Limited Primary School capacity Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt. Village within the Cotswolds National Landscape
High Littleton	45 dwellings over the Plan Period	Moderate connectivity score Moderate range of services & facilities	The North West, North and North East edges of High Littleton village are surrounded by the Green Belt. Limited Primary School capacity
Pensford	25 dwellings over the Plan Period	Moderate range of services & facilities	Low connectivity score Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site(s) for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt. Limited Primary School capacity

Bishop Sutton	33 dwellings over the Plan Period	Moderate range of services & facilities Some Primary School capacity identified	Low connectivity score Village within the Mendip Hills National Landscape
Temple Cloud	30 dwellings over the Plan Period	Moderate connectivity score Broad range of services & facilities	Limited Primary School capacity Air Quality Management Area
Timsbury	59 dwellings over the Plan Period	Moderate connectivity score Broad range of services & facilities Some Primary School capacity identified	The northern edge of the village is in the Green Belt

Do you agree with this approach to potential development locations in rural areas? Do you think we should aim to concentrate new development in the most sustainable villages, or spread it across all identified villages? Please give reasons for your answer.

Is our assessment of these priority areas appropriate and effective? Is there anything else you think we should consider? Please give reasons for your answer.

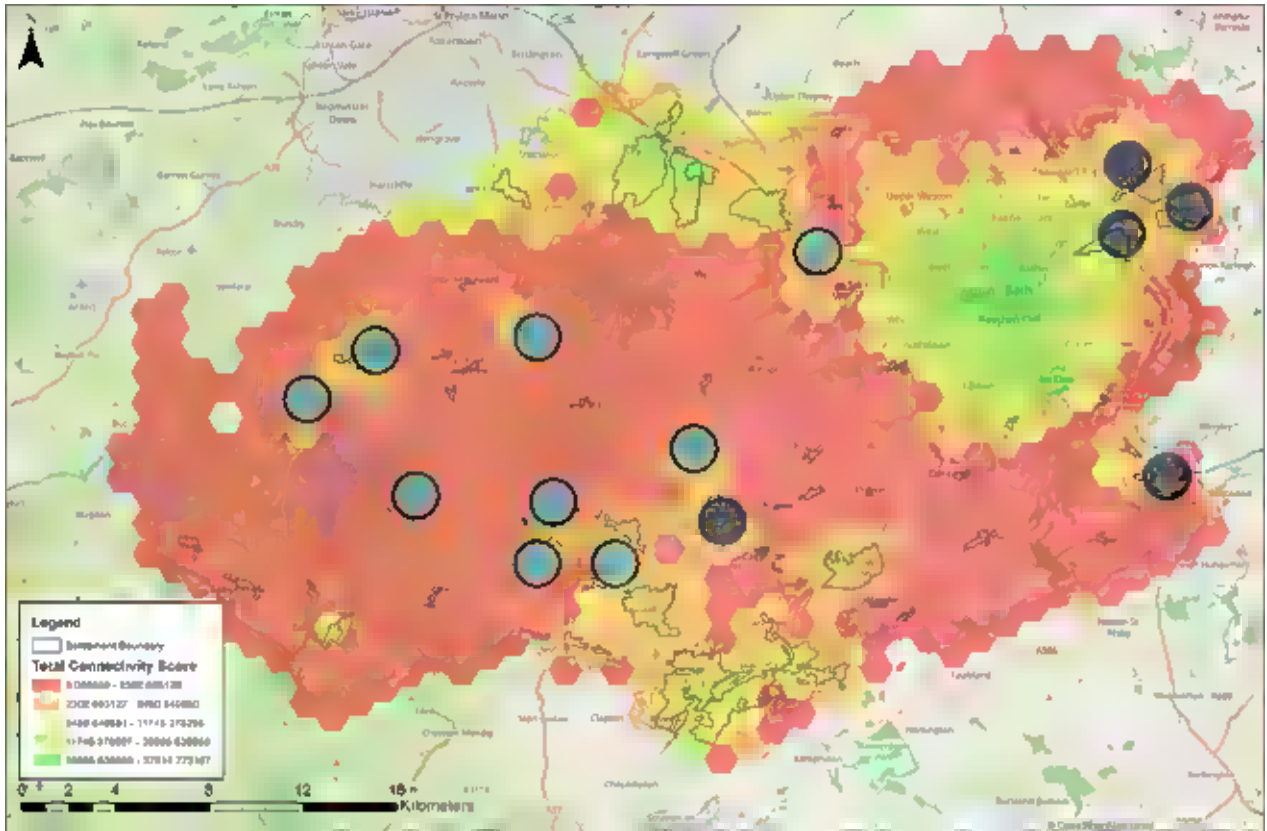


Figure 61: Rural areas relative connectivity map

9 Development Management Policy Options

- 9.1 Development Management policies set out local standards and criteria against which planning applications for the development and use of land and buildings are assessed.
- 9.2 We recently updated a significant number of Development Management policies through the adoption of our Local Plan Partial Update. A number of these policies are therefore considered up to date, and are not proposed to be amended through preparation of the new Local Plan. A table listing the policies that are considered to not require amendment is set out at appendix 1.
- 9.3 Development Management policies must conform with national planning policy contained in the NPPF and the technical planning practice guidance which supports it. The government have recently published an intention to prepare National Development Management Policies (NDMP), which would be given statutory status in determining planning applications and sit alongside policies set out in Local Plans. This should mean that Local Plans will be quicker to prepare, and focus only on locally relevant policies. However, uncertainty exists around the scope and preparation timescales for these NDMPs and the scope for local planning authorities to define local standards that differ to those in some NDMPs. Therefore, the council has prepared options relating to Development Management policies in the Local Plan for the purposes of public consultation. Development Management policies must also reflect any future changes to permitted development rights i.e. those forms of development that the government defines as not requiring planning permission. This will be kept under review in preparing the Draft Local Plan.

Housing

Policy H/AH: Affordable Housing

- 9.4 Background and evidence can be found in the Housing Topic Paper and the Local Housing Need Assessment (LHNA).

Large Sites

- 9.5 Paragraph 63 of the National Planning Policy Framework (NPPF December 2023) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies.

- 9.6 The LHNA sets out an affordable housing requirement of 77% of overall housing need within Bath City and 31% within the rest of Bath and North East Somerset. On large sites (or major applications) providing at least 10 dwellings a proportion of the homes delivered will be required to be affordable housing of various tenures, including social rent and low cost home ownership.
- 9.7 Whilst the evidence in the LHNA sets out the affordable housing need within the district and the split between social rent and low cost home ownership, this evidence will need to be viability tested (alongside other Local Plan policy requirements) to inform the proportion of affordable housing to be required on qualifying sites. The Local Plan viability assessment will be undertaken to inform the Regulation 19 Draft Local Plan and is likely to strongly influence the proportion of affordable housing that will be sought on qualifying sites particularly in Bath. Therefore, at this Options stage the proportion of affordable housing to be required is not established, nor the tenure split. Both will be set out in the Regulation 19 Draft Local Plan.
- 9.8 It is proposed to take forward the requirement for affordable housing on large sites as follows:

H/AH: Affordable Housing (Large Sites)	Proposed Approach
1	<p>Affordable Housing will be required as on-site provision in developments of 10 dwellings* and above (0.5ha and above) in line with percentages set out in the LHNA and as tested through the Local Plan viability (whole plan) assessment. It is also proposed this will be on a grant free basis.</p> <p>*Note: that dwellings is not confined to C3 use class but comprises all residential accommodation that provides a dwelling for a household. Some forms of dwellings are subject to separate Affordable Housing policy options e.g.co-living and Build to Rent schemes.</p>

- 9.9 The proposed Affordable Housing policy approach will also take forward current policy as relates to sub-division and phasing and other design elements, affordability in perpetuity and that any sales or staircasing affecting affordable housing delivered through Affordable Housing policy will be made to recycle the receipts/subsidy for the provision of new alternative affordable housing located elsewhere within Bath and North East Somerset. Property size and mix will be guided by the LHNA and other local housing requirements. The policy will also include delivery mechanisms and include our current approach to vacant building credit.

Question: Do you agree with this approach?

First Homes

- 9.10 National policy also requires that at least 25% of the affordable housing secured on large sites should be delivered as First Homes. These are dwellings that are available to purchase for first time buyers at a discounted price, set nationally at a minimum of a 30% discount. National policy also stipulates that the maximum price to be paid for a First Home (after the discount has been applied) must be no higher than £250,000. Evidence previously produced by the council showed that, given the relationship between incomes and house prices, First Homes will still be relatively unaffordable in Bath and North East Somerset and would not meet the needs of those households requiring affordable housing. As such evidence showed that shared ownership provides a more affordable low-cost home ownership product within the district. The council set out its approach to First Homes in the Bath and North East Somerset [First Homes Interim Position Statement](#), which in summary is that First Homes will not be mandatorily required on qualifying large sites.
- 9.11 However, through the preparation of the Local Plan 2022-2042 this approach needs to be reviewed in light of up to date evidence. The LHNA shows that there is a significant need for more affordable forms of housing for those households that can afford market rents, but aspire to home ownership. This need is particularly significant in Bath. First Homes are a product that could play a useful role in meeting this need, alongside shared ownership homes. Therefore, as an option it is proposed to require that 25% of all affordable housing secured on a large site should be delivered as First Homes. It is also proposed that, despite house prices being very high in the district, especially in Bath, the discount should be set at 30% because a greater discount would reduce the amount of developer subsidy available to fund provision of shared ownership homes which are crucial in helping to meet affordable housing need more widely. Given the 30% discount evidence shows that it is likely that First Homes in Bath will typically be smaller (1 and possibly 2 bed) dwellings given the £250,000 price cap.

H/AH: First Homes (Large Sites)	Option
1	It is proposed that on qualifying large sites 25% of all affordable housing secured will be required to be delivered as First Homes. The First Homes will be provided at a 30% discounted price and sold at a price, after the discount has been applied, of no more than £250,000.

Question: Do you agree with this approach?

- 9.12 Evidence of need for more affordable forms of housing for those that aspire to home ownership is corroborated by the Economic Strategy, which notes there is a need for housing that can be afforded by essential local workers and other workers in the local economy. Essential local workers are defined in the NPPF as ‘Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers’.
- 9.13 The lack of availability and affordability of housing is making it difficult for some employers, including those in the public sector, to attract and retain staff. First Homes may play a role in helping to meet this need. In addition, there may be an opportunity for employers to provide affordable housing for their essential local worker staff on specific sites or land that they own. The Council is considering whether to introduce a policy approach that would seek to facilitate delivery of such employer linked affordable housing for essential workers on specific sites e.g. enabling 100% affordable housing schemes to be developed by potentially being more flexible in terms of tenure mix. Subject to evidence of need, there may be a case to allow such essential worker housing as an exception to other policies in the Local Plan (these would be defined in the Draft Local Plan).

Questions:

Do you agree with this approach? If you consider that an essential worker exceptions housing policy should be included in the Draft Local Plan what factors should be covered within the policy?

Do you consider that any such Local Plan policy should use the NPPF definition of essential workers and if not, what changes should be made?

Small Sites

- 9.14 Paragraph 65 of the NPPF sets out that provision of affordable housing should not be sought for residential proposals that are not major development applications, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).
- 9.15 The Cotswolds National Landscape and Mendip Hills National Landscape are designated rural areas within Bath and North East Somerset and cover almost a third of the local authority area. Both the Cotswold National Landscape and Mendip Hills Management Plans highlight affordable housing requirements to meet the needs of local rural communities within the National Landscapes.
- 9.16 It is proposed to take forward the requirement for affordable housing on small sites within designated rural landscapes, given nationally protected landscape national policy as relates to major development and limited opportunities to bring forward affordable housing within these sensitive landscapes.
- 9.17 Options as relates to small sites are as follows:

H/AH: Affordable Housing (Small Sites)	Option	Advantages	Disadvantages
A	Residential developments on small sites from 5 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.

B	Residential developments on small sites from 2 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.
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Do you prefer option A or B? Please explain the reasoning.

Viability

- 9.18 The NPPF December 2023 paragraph 58 states that ‘Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.’
- 9.19 Planning Practice Guidance: Viability sets out that ‘Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage’ and ‘Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.’ However, PPG also includes a caveat on this that ‘It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage’ and sets out how viability should be reviewed during the lifetime of a project, principles for carrying out viability assessments and standardised inputs to viability assessments.

9.20 Given the aims of this Local Plan in maximising the delivery of affordable housing to respond to the district's demographic, social and economic needs and the significant requirement for affordable housing within the local authority area as set out in the LHNA, it will be imperative that new development deliver affordable housing to meet the need. We require policy that is clear that viability of affordable housing has been tested at plan-making stage. We will maximise opportunities to deliver affordable housing wherever possible through planning obligations and other delivery mechanisms.

9.21 Options as relates to affordable housing viability are as follows:

H/AH: Affordable Housing (Viability)	Option	Advantages	Disadvantages
A	Take forward existing policy as relates to affordable housing viability with the addition that where an application fails to provide the full affordable housing policy requirement, to include effective review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development where viability improves or the availability of grant.	Maximising the delivery of affordable housing over the lifetime of development given the significant requirement for affordable housing within B&NES.	Resource to implement review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development.

<p>B</p>	<p>Update existing affordable housing viability policy highlighting the presumption that there should be no need for further viability assessment at the decision-making stage. It is for the applicant to demonstrate whether particular circumstances (e.g. relating to abnormally high development costs, such as remediating substantial site contamination) justify the need for a viability assessment at the application stage and under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.</p> <p>In considering affordable housing viability within the proposed development, the following considerations will be taken into account:</p> <ul style="list-style-type: none"> • Whether grant or other public subsidy is available. • The tenure and size mix of the affordable housing to be provided. • Whether there are exceptional build or other development costs. • The achievement of other planning obligations. <p>Where an application fails to provide the full affordable housing policy requirement, to include</p>	<p>Providing clarity and Development Plan status on viability aspect of policy and maximising the delivery of affordable housing given the significant requirement for affordable housing within Bath and North East Somerset.</p>	<p>Resource to implement review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development.</p>
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	effective review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development where viability improves or the availability of grant.		
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Do you prefer option A or B? Please explain reasoning.

Policy H/RS: Affordable Housing Regeneration Schemes

- 9.22 In promoting healthy and safe communities, the NPPF (December 2023) under paragraph 98 sets out that 'Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.'
- 9.23 The case for regeneration of areas of social housing is often based on a concentration of poor-quality and energy inefficient housing stock, in both larger estates and smaller developments, where a comprehensive programme of repair or refurbishment is not a cost effective or deliverable solution. The other significant driver for regeneration of social housing estates is the correlation between the large concentrations of social housing stock and socio-economic deprivation. In these cases, even large-scale investment in existing housing stock may not address the socio-economic challenges or lessen the strain on wider support services across the area.
- 9.24 In some instances, redevelopment-led regeneration of social housing may be the most effective means of delivering improvement. Policy H8 in the Placemaking Plan seeks to facilitate such redevelopment in order to deliver enhancement to the social housing stock.
- 9.25 In seeking to facilitate redevelopment or regeneration of social housing the current policy seeks, as the starting point, to ensure that there is no net loss in affordable housing. However, the current policy caveats this position by stating that it is subject to viability considerations and other social balance considerations. Therefore, it allows the applicant to demonstrate viability or social balance/community mix reasons as to why retaining the existing number of affordable units cannot or should not be delivered.
- 9.26 As outlined above, the need for affordable housing within Bath and North East Somerset and particularly in Bath is significant and therefore, any potential loss of affordable housing through the operation of the current policy is of concern.
- 9.27 It is proposed that options relating to the explicit inclusion of viability considerations within the policy should be considered. The alternative means of improving social housing stock through refurbishing or repairing individual properties also has a financial cost. In operating the policy and considering viability, the cost of property repair/refurbishment should be taken into account.
- 9.28 Options as relates to Affordable Housing Regeneration Schemes are as follows:

H/RS: Affordable Housing Regeneratio n Schemes	Option	Advantage s	Disadvantage s
A	Where the redevelopment/regeneration of areas of social housing is supported it is required that there will be no net loss of affordable housing subject to social balance considerations.	Maximise affordable housing delivery.	Viability considerations.
B	Where the redevelopment/regeneration of areas of social housing is supported it is required that there is no net loss of affordable housing subject to social balance and viability considerations.	Ensures and potentially maximises affordable housing delivery.	Could reduce affordable housing delivery.

Do you prefer Option A or Option B? Please explain reasoning.

Policy H/RES: Rural Exception Sites, First Homes Exception Sites and Community Led Development Exceptions Sites

Rural Exception Sites

9.29 The National Planning Policy Framework (NPPF December 2023) supports the delivery of rural exception sites to bring forward affordable housing to address identified local needs. Market housing can be included in rural exception schemes where this will facilitate the delivery of affordable housing. Schemes are typically on the edge of a rural community/village on a site that would not normally be granted planning permission for residential use.

- 9.30 Core Strategy Policy RA4 sets out the current policy in respect of rural exceptions sites that broadly reflects the NPPF. The supporting text to the policy currently emphasises that it is imperative that the majority of the scheme must be affordable and that a small proportion of market housing will only be permitted where it is robustly demonstrated it is needed to subsidise the provision of affordable housing.
- 9.31 Rural exceptions policy has not delivered any affordable housing to date during the Core Strategy period (2011 - 2029). This is largely due to changes in the affordable housing sector funding and delivery models, but also to the restrictive and overly complex nature of exception site delivery, as well as a relatively imprecise planning policy.
- 9.32 The current policy does not provide any guidance on the scale or size of exceptions sites that will be permitted and provides limited clarity on the level of market housing appropriate in cross-subsidising delivery of affordable housing. This lack of clarity is acting as an obstacle to the delivery of affordable housing on exceptions sites.
- 9.33 It is proposed that many key elements of the existing policy should be retained, including ensuring provision meets a demonstrable need for affordable housing, support of local communities, that homes remain as affordable housing in perpetuity and local connections tests are met. The need for affordable housing within a rural settlement will be determined through a Rural Housing Needs Survey based on robust methodology and housing need within the settlement as evidenced through the Housing (Homesearch) Register.
- 9.34 Given that 'exceptions site' development would be outside controlled/defined areas (i.e. the Housing Development Boundaries), sites should be identified through a sequential approach which includes assessment of the economic, social and environmental impacts. It is considered necessary to emphasise the importance of development being on sites well related to settlements and appropriate to their context in terms of character, scale and form and that have no adverse impact on internationally or nationally protected species and/or their habitats.
- 9.35 In relation to the Green Belt locations, rural exception sites will be allowed in the Green Belt only when it can be demonstrated that non-Green Belt alternative sites are not available. The policy would also seek to ensure that 'rural exceptions sites' are selected in order to minimise harm to the openness and purposes of the Green Belt.
- 9.36 Options as relates to Rural Exceptions Sites are as follows:

H/RES: Rural Exception Sites (Location)	Option	Advantages	Disadvantages
A	<p>In terms of the location of rural exception sites set no prescriptive approach in the policy and simply rely on the NPPF definition of Rural exception sites as 'Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.'</p>	<p>Reflects national policy.</p>	<p>Unclear where 'rural' exception sites policy applies.</p>

B	Set out in the policy within Bath and North East Somerset where and to which settlements rural exception sites will apply in line with the emerging rural areas strategy to support rural communities.	Provides clarity on policy.	Would not be applicable to all settlements (i.e. to those not listed).
H/RES: Rural Exception Sites (Scale)	Options	Advantages	Disadvantages
A	Continue to refer to Rural Exceptions Sites as applying to small sites. Generally small sites are defined as less than 10 dwellings.	Reflects national policy.	Current policy does not provide any guidance on the size of exception sites that will be permitted. Generally small sites are defined as less than 10 dwellings. This restricting the delivery of affordable housing on rural exceptions sites.

B	<p>Set out that sites could have a capacity of up to 20 dwellings in total subject to the levels of local housing need, cross-subsidy requirements, and size of the settlement.</p> <p>Further guidance might be needed as to village size proportionality in order to determine where a maximum site capacity would be less than 20 dwellings.</p>	<p>Provides clarity on policy.</p> <p>The need for affordable housing within a rural settlement will be determined through a Rural Housing Needs Survey based on robust methodology and housing need within the settlement as evidenced through the Housing Register.</p>	<p>Developments could look to maximise site capacity.</p>
H/RES: Rural Exception Sites (Cross Subsidy)	Options	Advantages	Disadvantages
A	<p>Continue to refer to a small proportion of market housing will be appropriate only where it can be demonstrated that the market housing is essential to cross-subsidise the affordable housing and that the site would be unviable without this cross-subsidy.</p>	<p>Reflects national policy and is flexible.</p>	<p>Current policy provides limited clarity on the level of market housing appropriate in cross-subsidising delivery of affordable housing.</p>

B	Maximum of 40% market housing to meet local needs (including downsizing) will be appropriate where it can be demonstrated that the proportion of market housing proposed is essential to cross-subsidise the affordable housing and that the site would be unviable or undeliverable without this cross-subsidy, taking into account the availability of public subsidy.	Providing clarity on policy. Market housing will only be permitted where it is robustly demonstrated it is needed to subsidise the provision of affordable housing.	Developments could look to maximise market housing on site.
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First Homes Exceptions Sites

- 9.37 The government introduced First Homes exception sites to deliver affordable housing for first time buyers. First Homes exception sites have replaced entry-level exception sites and changes were made to national planning guidance to facilitate this. First Homes exception sites can address housing needs across the local authority area rather than be focussed on the needs of a specific community, although the local authority does have discretion to introduce local eligibility criteria where evidenced based. The Written Ministerial Statement (WMS) on Affordable Homes Update (24 May 2021) sets out national policy on First Homes.
- 9.38 First Homes exception sites cannot come forward in areas designated as Green Belt or AONBs and thus are limited in terms of which areas they can come forward in Bath and North East Somerset as can be seen on the map below. First Homes exception sites should be on land which is not already allocated for housing.

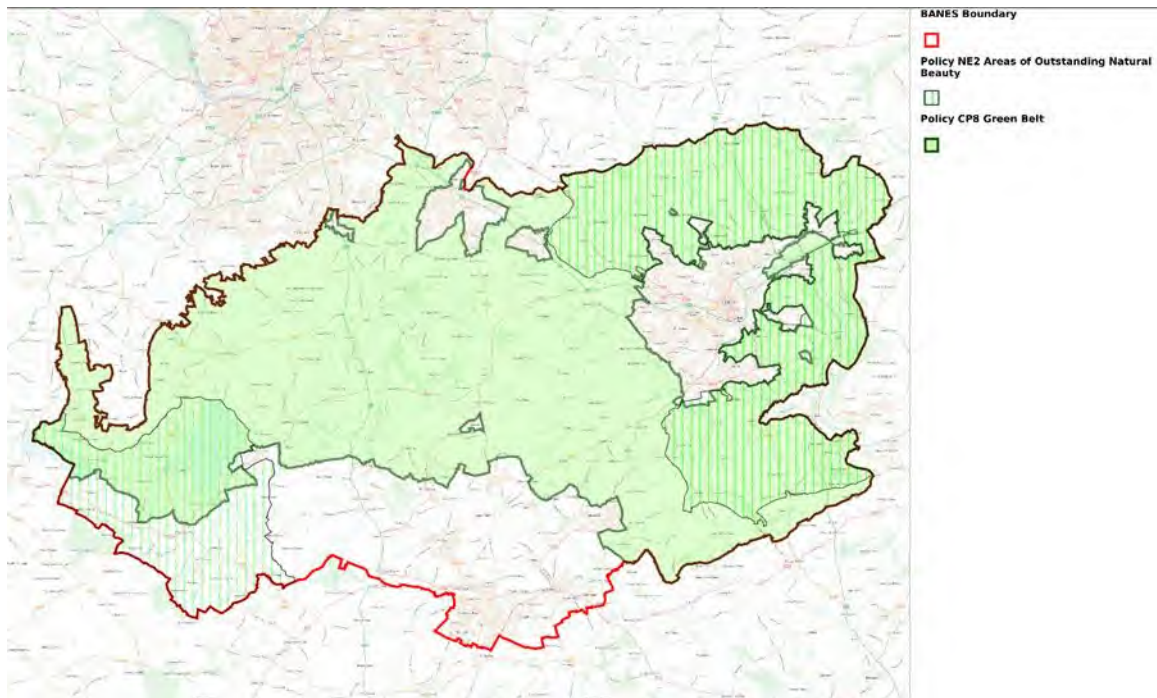


Figure 62: Map showing Green Belt and National Landscape designations across B&NES

- 9.39 The WMS (24 May 2021) sets out that First Homes exception sites should be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in the NPPF and comply with any local design policies and standards. Further Planning Policy Guidance on First Homes can be found at: <https://www.gov.uk/guidance/first-homes>
- 9.40 Given that there are limited areas in Bath and North East Somerset in which First Homes Exceptions Sites can come forward, Options are as set out in the table below. Please also see policy approach options relating to First Homes as an element of a qualifying large site.

H/RES: First Homes Exceptions Sites	Options	Advantages	Disadvantages
A	It is not proposed to take forward specific policy on First Homes Exception Sites within Bath and North East Somerset as there are limited areas in which these Exception Sites could come forward in Bath and North East Somerset and planning applications would be determined in line with National Policy (Written Ministerial Statement) and Guidance and the Development Plan.	Reflects national policy.	Does not consider Bath and North East Somerset specific requirements.
B	Take forward a criteria-based policy on First Homes Exception Sites within Bath and North East Somerset.	Provides a criteria-based policy on First Homes Exception Sites within Bath and North East Somerset.	Reiterates national policy.

Do you prefer Option A or Option B?

If you would like to see a criteria-based policy, what factors do you think the criteria should cover?

Community Led Housing

- 9.41 Community Led Housing is a way of delivering housing developments to meet local community needs. Paragraph 73 of the NPPF (December 2023) sets out that 'Local Planning authorities should support the development of exception sites for community-led development (as defined in Annex 2 of the NPPF) on sites that would not otherwise be suitable as rural exception sites.'

9.42 The NPPF further sets out that these sites should be on land which is not already allocated for housing and should: comprise one or more types of affordable housing as defined in Annex 2 of the NPPF, a proportion of market homes may be allowed on the site at the local planning authority's discretion, be adjacent to existing settlements, proportionate in size to them (not larger than one hectare in size or exceed 5% of the size of the existing settlement), not compromise the protection given to areas or assets of particular importance in the NPPF and comply with any local design policies and standards.

9.43 Proposed options as relates to exception sites for community led development are as follows:

H/RES: Community Led Development Exceptions Sites	Options	Advantages	Disadvantages
A	Do not take forward specific policy on exception sites for community-led development with planning applications being determined in line with National Policy and Guidance and the Development Plan.	Reflects national policy.	Does not consider Bath and North East Somerset specific requirements.
B	Take forward a criteria-based policy on exception sites for community-led development within B&NES.	Provides a criteria-based policy on exception sites for community-led housing within Bath and North East Somerset.	Reiterates national policy.

Do you prefer Option A or Option B?

If you would like to see a criteria-based policy, what factors do you think the criteria should cover?

Policy H/SH: Specialist Housing and Homes for Older People Design

- 9.44 Paragraph 135 of the NPPF highlights that planning policies should ensure that developments ‘create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users...’
- 9.45 Planning Practice Guidance (PPG) Housing for older and disabled people (published June 2019) sets out that it is critical to provide housing for older people as people are living longer and the proportion of older people in the population is increasing, and therefore offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities, and help reduce costs to the social care and health systems. It also sets out that provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.
- 9.46 The National Design Guide sets out that ‘Well-designed places include a variety of homes to meet the needs of older people, including retirement villages, care homes, extra-care housing, sheltered housing, independent living and age-restricted general market housing. They are integrated into new settlements with good access to public transport and local facilities.’
- 9.47 In considering national and local planning policy and guidance together with B&NES Council strategies, Options for policy within the new Local Plan are as follows:

H/SH: Specialist Housing and Homes for Older People Design	Option	Advantages	Disadvantages
A	Take forward current Development Plan Policy (H1 and relevant policy within CP10).	Provides policy on specialist housing and homes for older people design requirements.	<p>Current policy focusses on HAPPI standards and different design standards would be appropriate to different types of specialist housing and homes.</p> <p>Current policy falls under two different policies within the Development Plan.</p>
B	Take forward design requirements for specialist housing and older person housing and facilities in line with best practice design principles (and that meet with CQC standards where required).	<p>Provides policy on specialist housing and homes for older people design requirements.</p> <p>Proposes to include policy as relates to best practice design principles and that meets CQC standards where required.</p>	Whilst proposed policy sets out specialist housing and homes for older people design requirements, it does not include locational requirements.

C	Take forward design requirements for specialist housing and older person housing and facilities in line with best practice design principles (and that meet with CQC standards where required) and provide policy to ensure that specialist housing and homes for older people are designed to support integrated and cohesive communities in accessible locations.	<p>Provides policy on specialist housing and homes for older people design requirements.</p> <p>Proposes to include policy as relates to best practice design principles and that meet with CQC standards where required.</p> <p>In addition, it provides locational requirements i.e. supports integrated and cohesive communities in accessible locations.</p>	None identified.
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Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy H/EC: Affordable Housing Requirements within Older Person and Specialist Housing (including Extra Care)

9.48 Paragraph 63 of the (NPPF December 2023 requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

- 9.49 This range of homes includes housing for older people (including those who require retirement housing, housing-with-care and care homes). PPG Housing for older and disabled people highlights that ‘The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing.’ It further sets out that ‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’
- 9.50 There are different forms of older person specialist housing including age restricted housing, sheltered housing, extra care housing or housing with care and residential care homes and nursing homes. Some forms of specialist housing will be considered to be use class C3 (dwellings) and some will be considered to be use class C2 (residential institutions / communal accommodation) even though they constitute a dwelling.
- 9.51 National planning guidance sets out that it is for the local planning authority to determine which use class a particular development falls into but suggests that when making the decision consideration could be given to the level of care provided and the scale of communal facilities provided.
- 9.52 Within the High Court Judgment - Rectory Homes Ltd v Secretary of State for Housing Communities and Local Government [2020] EWHC 2098 (Admin) (31 July 2020) Justice Holgate set out that ‘There is no reason why a C2 development cannot provide accommodation in the form of dwellings provided its use did not fall within Use Class C3.’
- 9.53 In considering the need for specialist older person housing, including age restricted general housing, sheltered housing, extra care housing or housing with care as set out in PPG and which constitute a self-contained dwelling or unit, it is key that local authorities assess the size, type and tenure of housing needed for older people.
- 9.54 The Bath and North East Somerset Local Housing Needs Assessment Report (LHNA) (January 2024 Draft) sets out that ‘there would be a need to provide an additional 557 specialist older person housing units in Bath City (of which 43% would need to be provided as affordable housing) and 1,121 specialist units in the Rest of B&NES (including 50% affordable housing).
- 9.55 Given the primary objectives of the Local Plan which include ‘Maximising the delivery of affordable housing to respond to the district’s demographic, social and economic needs’, we will be looking to take forward the requirement for affordable housing within older person housing where it meets the definition of age restricted general housing, sheltered housing, extra care housing or housing with care where it is a dwelling or self-contained unit.
- 9.56 The proposed policy approach relating to the requirement for affordable housing within older person housing is as follows:

H/EC: Affordable Housing Requirements within Older Person and Specialist Housing (including Extra Care)	Proposed Approach
1	Take forward Affordable Housing requirements within specialist older person housing where it constitutes a self-contained dwelling or unit in line with percentages set out in the LHNA and as tested through the Local Plan viability (whole plan) assessment.

Question: Do you support this approach?

Policy H/AS: Accessible Homes and Residential Space Standards

9.57 Paragraph 135 of the NPPF (December 2023) states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. The accompanying footnote (Footnote 52) states that planning policies for housing should make use of the optional technical standards for accessible and adaptable housing and also the nationally described space standard, where these would address a need and can be justified.

Accessible Homes

9.58 Planning Practice Guidance (PPG) Housing: optional technical standards sets out that local authorities can require accessibility, adaptability and wheelchair standards in new dwellings provided that they have evidence that demonstrates a clear need for these types of housing and their resulting policies plan to meet this need. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirement.

- 9.59 PPG states that planning policies should only set out the requirements for enhanced accessibility or adaptability of dwellings through reference to the optional requirements within Part M of Building Regulations – M4(2) ‘accessible and adaptable dwellings’ and M4(3) ‘wheelchair user dwellings’. Any planning policies requiring either Building Regulations M4(2) and / or M4(3) should take into account site specific factors and that for developments where step free access is not viable, neither of the requirements should be applied.
- 9.60 Government consulted on raising accessibility standards for new homes and responded to consultation setting out that ‘Government proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes – option 2 in consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable (as detailed below). Subject to a further consultation on the draft technical details, we will implement this change in due course with a change to building regulations.’
- 9.61 The Local Plan Partial Update included an update to Policy H7: Housing Accessibility to provide suitable housing that meets the needs of different groups in the community, including disabled people, older people and families with young children. These accessibility standards were taken forward in line with the relevant evidence base and subject to viability testing.
- 9.62 Providing accessible housing is important in ensuring that the needs of older and disabled people are met, as well as creating the flexibility for homes to meet the changing needs of individuals and families at different stages of life. We are proposing housing accessibility standard Options as follows:

H/AS: Accessible Homes	Option	Advantages	Disadvantages
A	Take forward optional technical standards M4(2) and M4(3) in line with up-to-date evidence base (LHNA) and subject to viability testing and with reference to relevant caveats in exceptional circumstances where M4(2) and M4(3) standards cannot be delivered.	Provides accessible and adaptable housing that meets the needs of all.	None identified.
B	Take forward M4(2) and M4(3) standards in all housing. M4(3) requirements to be required in line with LHNA evidence base and subject to viability testing. Set out relevant caveats in exceptional circumstances where M4(2) and M4(3) standards cannot be delivered.	Provides accessible and adaptable housing that meets the needs of all.	Viability considerations.
C	Take forward M4(3) standards in line with up-to-date evidence base and subject to viability testing. Set out relevant caveats in exceptional circumstances where M4(3) standards cannot be delivered. (This option would be reliant on the requirement of M4(2) accessibility standards to come forward through Building Regulations updates.)	Provides wheelchair housing to meet the needs of disabled people (both for wheelchair accessible and wheelchair adaptable housing).	Reliant on the requirement of M4(2) accessibility standards being brought forward through Building Regulations update.

9.63 Where M4(2) and M4(3) cannot be delivered, the requirement would be to deliver M4(1) compliant dwellings.

Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Residential Space Standards

- 9.64 Planning Practice Guidance (PPG) provides that where a local planning authority wishes to require an internal residential space standard that this can only be done by reference to the nationally described residential space standard (NDSS) within their Local Plan. The nationally described residential space standard sets out internal space requirements relating to bedrooms, storage and internal areas for new dwellings, with the requirements determined by the number of storeys, bedrooms and bedspaces.
- 9.65 The National Design Guide 2021 highlights that good design promotes quality of life for occupants and users of buildings including function and should provide comfort, safety, security, amenity, privacy, accessibility, and adaptability. It further sets out that 'Well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation.'
- 9.66 NDSS are required within Affordable Housing within B&NES and were taken forward within the B&NES Planning Obligations SPD subsequent to the Housing Standards Review in 2015. Options as relates to Nationally Described Space Standards (NDSS) in Affordable Housing are as follows:

H/AS: Residential Space Standards	Option	Advantages	Disadvantages
A	Take forward the requirement for NDSS within Affordable Housing in the Local Plan as currently set out in the B&NES Planning Obligations SPD in line with evidence base (note – this is subject to the Local Plan viability assessment that will inform the Draft Local Plan).	Where a local planning authority requires an internal space standard, they should only do so by reference in the Local Plan to the NDSS.	None identified.
B	Leave current NDSS requirements for Affordable Housing in the B&NES Planning Obligations SPD.	Current policy.	Where a local planning authority requires an internal space standard, they should only do so by reference in the Local Plan to the NDSS.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

- 9.67 We do not currently have a requirement for NDSS within market housing in our adopted Local Plan, although within B&NES anecdotal evidence suggests that generally developments are brought forward using these space standards.
- 9.68 Given the health and wellbeing benefits for residents of NDSS and viable delivery, we are proposing to test options around the requirement for NDSS within market housing, including Build to Rent schemes

9.69 We also need to consider our approach to space standards in terms of delivering high quality innovative approaches to alternative forms of housing such as micro-housing and co-living to meet the needs of some of our communities, considering how we would ensure how high amenity levels can be reached without NDSS (see separate section on co-living below).

9.70 Options as relates to NDSS in market housing are as follows:

H/AS: Residential Space Standards in Market Housing	Option	Advantages	Disadvantages
A	Do not take forward NDSS requirements within policy as relates to market housing.	Developments are not required to take forward NDSS within market housing.	Developments may not provide minimum dimensions and design criteria which would be detrimental to residential amenity/quality of life.
B	Take forward the requirement for NDSS within market housing within the Local Plan in line with the evidence base. Note: NDSS requirement would not apply to specific types of residential accommodation e.g. co-living, as set out later in this chapter.	NDSS include minimum dimensions and design criteria to make homes comfortable, safe and adaptable to allow people to carry on everyday activities at ease.	Viability considerations.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy H/HM: Housing Mix

- 9.71 Paragraph 63 of the NPPF (December 2023) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.
- 9.72 Consultation on the B&NES Local Plan 2022-2042 Launch Document (October 2022) provided feedback from a range of stakeholders who highlighted the need to ensure that housing mix meets the needs of their local communities, including young people, young families, single residents, keyworkers, families and an ageing population.
- 9.73 Policy CP9: Affordable Housing and Policy CP10: Housing Mix of the B&NES Local Plan provides policy requirements as relates to housing mix within affordable housing and market housing. Whilst the mix of affordable housing units is delivered to reflect current evidence base (housing needs assessment and housing needs register) and in consultation with the council to ensure that the housing delivered meets needs, there are issues that within market housing, particularly on smaller sites, some housing mixes are driven more by commercial considerations than local need.
- 9.74 It will be important that housing mix within developments reflect the needs of local communities. Rural Exception site policy highlights that the need for affordable housing within a rural settlement will be determined through a Rural Housing Needs Survey based on robust methodology and housing need within the settlement as evidenced through the Housing (Homesearch) Register. The Survey will also consider the proposed housing mix required within the community.
- 9.75 Options as relates to proposed housing mix policy are as follows:

H/HM: Housing Mix	Option	Advantages	Disadvantages
A	Take forward policy in line with that currently set out in Policies CP9 and CP10 of the Development Plan.	Current policy.	Policy lacks clarity particularly as relates to housing mix requirements within market housing.
B	Take forward policy in line with that currently set out in Policies CP9 and CP10 of the Development Plan. Further to highlight that housing mix on the application site should meet the needs of different household types and sizes within local communities as demonstrated by evidence either through a Local Housing Needs Survey or the LHNA.	Provides clarity on housing mix required in affordable and market housing in line with an up-to-date evidence base.	Viability considerations.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy H/BtR: Build to Rent Developments

Background

- 9.76 Build to rent (BtR) is purpose-built housing, typically 100% rented out. It can form part of a wider multi-tenure development but should be on the same site and/or contiguous with the main development. The detailed background and evidence relating to the following options is set out in the Housing Topic Paper.

Location of Build to Rent Schemes

- 9.77 National Guidance states that where a Local Housing Need Assessment identifies a need for BtR developments, authorities should include a Local Plan policy setting out their approach to promoting and accommodating BtR, recognising the circumstances and locations where it will be encouraged. As such, the following options are proposed:

H/BtR: Build to Rent Developments – Location of BtR Schemes	Option	Advantages	Disadvantages
A	Policy to set out preferred situations in which BtR will be encouraged, i.e. located in city / town centre locations	Encourages BtR in sustainable locations	Restricts smaller BtR schemes outside town centres – could be considered too restrictive
B	Policy to restrict BtR developments, apart from within site allocations where levels of provision are specified, based on local need	Ensures provision as an appropriate balance of tenures within a scheme, based on need	Restricts BtR other than site allocations – could be considered too restrictive
C	Policy to stay silent on the preferred location of BtR developments, therefore allowing the market to lead location of future development	Provides flexibility	PPG requires approach to promoting and accommodating BtR to be set out in LP

Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Affordable Private Rent Discount Level

- 9.78 National policy states that affordable private rent should be set at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property.
- 9.79 Evidence set out in the Housing Topic Paper shows that the 20% discount set out in the NPPF does not provide an affordable level of rent in B&NES. To address this, the following options are proposed:

H/BtR: Build to Rent Developments – Affordable Private Rent Discount Level	Option	Advantages	Disadvantages
A	Affordable Private Rent provided at a level that is equivalent to or below Local Housing Allowance for the relevant sized property (inclusive of service charges).	APR will be at level of LHA and therefore genuinely affordable in Bath and North East Somerset	Potential for reduced numbers of affordable units provided due to requirement for lower APR levels
B	Affordable Private Rent provided at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property.	Potential for increased number of APR homes provided compared to option 1, due to higher APR levels	<p>Reliant on planning application determination process to seek higher than 20% discount to meet affordability required in Bath and North East Somerset</p> <p>Unlikely to meet LHA levels</p>

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Affordable Private Rent homes required in each development

- 9.80 Planning Practice Guidance advises that 20% is generally a suitable benchmark for the level of affordable private rent homes to be in any build to rent scheme. However, if local authorities wish to set a different proportion, they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their Local Plan.
- 9.81 Data in the LHNA evidences a significant need for affordable housing in Bath and North East Somerset. In Bath, the level of affordable housing required is around 77% of total housing provision, and outside of Bath, the level is around 31%.
- 9.82 As such, the following options test the delivery of a higher percentage of affordable housing from Build to Rent schemes, consistent with standard affordable housing percentages required across other housing types. The options will be subject to viability testing.

H/BtR: Build to Rent Developments – Affordable Private Rent homes required in each development	Option	Advantages	Disadvantages
A	At least 20% affordable private rent homes to be provided (and maintained in perpetuity)	In line with NPPF recommendation	Lower levels of AH provided than shown to be required in the LHNA
B	Percentage of affordable private rent homes to be provided (and maintained in perpetuity) in line with standard affordable housing percentages required across other housing types.	Levels in line with affordable housing percentages required across other housing types	Viability implications (to be tested)

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy H/CL: Co-living Schemes

Background

- 9.83 Co-living Schemes are not defined in national policy or guidance. They are purpose-built residential schemes, that often comprise studio bedspaces with access to shared communal facilities. Schemes may be new build, or conversions of existing buildings. They fall under a sui generis planning use class, and are not restricted to any particular user group, i.e. students.
- 9.84 Co-living is a relatively new housing model which allows occupiers to live together communally with accommodation containing individual bedrooms and communal areas such as kitchens, living areas, and areas to work.
- 9.85 Co-living schemes are being promoted by developers as a more affordable and transitional form of purpose built rented accommodation for various groups of people such as young professionals or recent graduates who are on their way to transitioning to rented self-contained flats or houses, or home ownership.
- 9.86 Some co-living schemes are aimed at other groups, such as older people, who have chosen to move out of individual homes, and live communally. There are also examples of co-living schemes in the UK where intergenerational living is promoted.
- 9.87 Co-living is considered to provide an alternative to traditional shared housing, and often includes the provision of additional services and facilities, such as on-site gyms and concierge services.
- 9.88 The adopted B&NES Local Plan does not currently comprise a policy relating to co-living developments, against which to assess planning applications. As such, policy options are set out below relating to location and provision, affordable housing, and amenity standards.

Location and Provision

- 9.89 As co-living schemes are mainly aimed at young professionals and recent graduates, or older people who have chosen to move out of individual homes and live communally, it is considered important that the accommodation is located in highly sustainable locations, very well connected by public transport, and are close to employment opportunities and amenities. Regarding this, the following options are proposed:

H/CL: Co-living Schemes – Location and Provision	Option	Advantages	Disadvantages
A	Policy to set out preferred location in which co-living will be encouraged, i.e. located in city / town centre locations	Encourages co-living in sustainable locations	Restricts smaller co-living schemes outside town centres – could be considered too restrictive?
B	Policy to stay silent on the preferred location of co-living developments, therefore allowing the market to lead location of future development	Provides flexibility	No control over future provision / location

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Affordable Housing Provision

- 9.90 Co-living is considered to fall under a sui generis planning use class.
- 9.91 Adopted policy CP9 in the B&NES Core Strategy requires developments of 10 or more dwellings to provide on-site provision of affordable dwellings, unless evidence is submitted to show that such provision would be unviable.
- 9.92 It is established in planning legislation that a dwelling refers to a unit of residential accommodation which provides the facilities needed for day-to-day private domestic existence.
- 9.93 Co-living schemes generally provide studio accommodation which comprise the facilities required for single person occupancy, comprising a bed, seating, bathroom facilities, and a small kitchen or kitchenette. It is therefore appropriate that co-living accommodation contributes to affordable housing provision within the District.
- 9.94 However, because it does not meet minimum housing space standards co-living accommodation is not considered to provide a suitable form of affordable housing in itself.
- 9.95 As such, a financial contribution is required in lieu of on-site provision.

H/CL: Co-living Schemes – Affordable Housing Provision	Option	Advantages	Disadvantages
A	Requirement for all co-living schemes to provide a financial contribution in lieu of on-site affordable housing provision.	Provision of affordable housing on co-living development sites	Viability implications (to be tested)

Question: Do you agree with this approach?

Amenity Standards

- 9.96 Housing design standards (including NDSS) and policies do not apply to co-living accommodation as it falls under a sui generis use class. Therefore policies and guidance are considered to be required to provide consistent standards to ensure good quality, well-managed living spaces are provided, that positively integrate with the surroundings.
- 9.97 Reference is made within the options to exploring the adoption of NDSS for market housing. Whilst the layouts of co-living developments are not usually appropriate to meet the requirements of NDSS, reference is proposed to a need to provide high quality amenity spaces which meet the needs of occupants.

H/CL: Co-living Schemes – Amenity Standards	Option	Advantages	Disadvantages
A	Policy setting out requirement to ensure good quality, well-managed living spaces.	Flexibility for developers	No consistent set of standards to assess planning applications
B	Policy setting out specific requirements to ensure good quality, well-managed living spaces, including minimum room sizes for bedrooms and communal areas, lighting standards, and management requirements.	Provides consistent set of standards to assess planning applications	Less flexible in terms of building layout, accommodation size and management

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy H/PBSA: Purpose built student accommodation

Provision and Location

- 9.98 Policy H2A in the LPPU directs PBSA to on-campus locations, or elsewhere in the District where a nomination agreement with an educational establishment is provided, or where the PBSA would be provided for 2nd and 3rd year students.
- 9.99 The University of Bath and Bath Spa University have provided the Council with projected student growth figures, which are set out in the Student Growth Topic Paper. The Topic Paper also sets out the calculation used to predict the number of additional PBSA bedspaces that would be required across the Plan period in order to support this growth, taking into account the existing PBSA within the City, as well as any already in the pipeline.
- 9.100 If an assumption is taken that both universities were to grow in line with their projections up to 2030, with an assumed 1% annual growth from 2030 – 2042, approximately 4,734 (or 237 per year) additional PBSA bedspaces would be required across the Plan period, in addition to those already in the pipeline.
- 9.101 If there was no growth assumed between 2030 – 2042, there would be a requirement of approximately 1,805 (or 90 per year) additional PBSA bedspaces across the Plan period, in addition to those already in the pipeline.
- 9.102 If an assumption is taken that both universities will grow at the same rate between 2030 – 2042 as predicted between 2022 – 2030, there would be a requirement of approximately 10,093 (or 505 per year) additional PBSA bedspaces across the Plan period, in addition to those already in the pipeline.
- 9.103 The LHNA calculates predicted growth in student population based on average growth trends for the 20-year period between 2001-2021. This is consistent with the approach taken for other forms of housing. The LHNA calculates that the number of the students requiring accommodation in Bath and North East Somerset to be 7,300 (or 370 per year).
- 9.104 Challenges exist in accommodating continued levels of student growth within Bath, and across the District, particularly given the higher priority for accommodating non-student housing and especially affordable housing to meet local need and employment space. Additionally other Local Plan priorities e.g. relating green infrastructure provision and protection of the World Heritage Site, its setting, and other heritage assets also limit the ability to accommodate further PBSA. The following options test three ways in which provision of PBSA could be accommodated and controlled within the District.

H/PBSA: Purpose Built Student Accommodation - Provision and Location	Option	Advantages	Disadvantages
A	Restrict PBSA across the district other than on-campus	<p>Protection of sites in B&NES for general housing and employment uses</p> <p>Encourages exploration of campus provision outside B&NES</p>	<p>If provision of PBSA is not in line with educational establishment growth, potential to limit growth, or increase HMO numbers across the district</p>
B	<p>Allow PBSA to only be developed on sites specifically allocated for that purpose, including a review of potential locations outside Bath, i.e. Keynsham and Hicks Gate</p>	<p>Better management of location and quantum of PBSA</p> <p>Protection of sites for general housing and employment uses, or a mix including some PBSA</p> <p>Encourage exploration of sustainable locations outside the city to provide PBSA</p>	<p>If provision of PBSA is not in line with educational establishment growth, potential to limit growth, or increase HMO numbers across the district</p> <p>Sites outside Bath potentially not as sustainable for students travelling to universities</p> <p>Green Belt release for PBSA would require exceptional circumstances justification</p>

C	Retain LPPU policy H2A as worded, giving educational establishments flexibility to use nomination agreements to bring forward PBSA	Flexibility for educational establishments to meet growth needs off-campus	Off-campus PBSA likely to lead to loss of land for employment and general housing Off-campus PBSA is market-led, so likely to provide higher proportion of studios, rather than more affordable cluster flats
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Do you prefer Option A, Option B or Option C?

PBSA Affordable Housing or Rent

- 9.105 LPPU policy H2A does not currently require the delivery of affordable housing or affordable rent in relation to provision of PBSA.
- 9.106 Both universities in the city of Bath have raised significant concerns relating to the high cost of student accommodation, and the negative impact that these high costs have on the well-being of their students.
- 9.107 The B&NES Local Housing Needs Assessment sets out a significant need for affordable homes across the District, particularly within the city of Bath.
- 9.108 In order to meet the priorities of the Local Plan relating to providing homes that are affordable, the options below seek to introduce a requirement for all PBSA developments to contribute towards housing that is affordable within the District, either through a contribution to conventional C3 affordable housing, or provision of on-site affordable student accommodation.
- 9.109 The first option (A) seeks to meet the needs of students who struggle to afford the high costs of accommodation in the city, by requiring all PBSA developments to deliver a certain percentage of bedspaces as 'affordable student accommodation', which is likely to be defined as being set at a rent level that is no more than 55% of the maximum maintenance grant available for that academic year.

- 9.110 The second option (B) seeks to meet the general need for affordable dwellings in the city by requiring all PBSA developments to deliver a cash in lieu contribution towards conventional C3 affordable housing. This option is justified by the consideration that sites allocated for PBSA could otherwise have been allocated for use as C3 dwellings, which would be required to provide 30% or 40% on-site affordable housing. As PBSA does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself. Therefore, a cash in lieu contribution is required towards conventional C3 affordable housing.
- 9.111 The third option (C) seeks to meet both needs, by requiring provision of affordable student accommodation for PBSA developments located on-campus, or sites owned by either of the universities, and a cash in lieu contribution towards conventional C3 affordable housing.

H/PBSA: Purpose Built Student Accommodation - Affordable Housing or Rent	Option	Advantages	Disadvantages
A	Requirement for all PBSA developments to deliver at least 30% of bedspaces as 'affordable student accommodation'	Meets need of students unable to afford accommodation	Loss of affordable housing on sites that could otherwise be allocated for C3 dwellings
B	Requirement for all PBSA developments to deliver a cash in lieu contribution towards conventional C3 affordable housing	Provides a contribution to conventional affordable housing, on sites that could otherwise have been allocated for C3 dwellings	Does not meet the needs of students unable to afford accommodation
C	Requirement for PBSA developments located on-campus or on sites owned by an educational establishment to deliver at least 30% of bedspaces as affordable student accommodation, and PBSA developments located elsewhere to deliver a cash in lieu contribution towards conventional C3 affordable housing	Partly meets the need of students unable to afford accommodation (on-campus), and also facilitates delivery of contributions towards conventional affordable housing on sites that could otherwise have been allocated for C3 dwellings	Fewer affordable student rent properties than option 1. Fewer contributions to conventional affordable housing than option 2. Potentially more complicated to implement.

Question: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy H/SBCHB: Self and Custom Housebuilding

- 9.112 The NPPF states that Councils should plan for a mix of housing including for people wishing to build their own homes. The Self-build and Custom Housebuilding Act 2015 introduced a duty on local authorities to keep a register of people who want to build their own homes and to grant permissions for enough serviced plots of land to meet the demand on the register. Self-build permissions are identified using claims for exemption from Community Infrastructure Levy (CIL) payments (self-build dwellings are exempt from CIL).
- 9.113 Policy H4 in the Placemaking Plan encourages self-build, but it does not create a policy environment that directly facilitates the delivery of self and custom build housing. Therefore, in order to facilitate the approval of the number of plots required to meet demand, it is considered that further policy intervention is necessary, as sufficient plots are unlikely to come forward without it. Promotion of self-build is also in accordance with the Government's stated ambition of diversifying the housing market (i.e. moving away from a market dominated by large-volume housebuilders).
- 9.114 The existing policy framework already allows for single plot self-build schemes to come forward within urban areas and villages (within Housing Development Boundaries), and small numbers are currently being delivered.
- 9.115 Other Councils have also introduced requirements for a minimum proportion of large sites to be self-build – for example, Teignbridge and South Gloucestershire have policies requiring a 10% self-build plots on sites over 20 and 100 respectively. Others have gone further still, for example, Cherwell District Council has purchased and allocated land for around 2,000 self-build dwellings and expects to make a financial return.
- 9.116 There are a number of different policy approaches that could be explored which might help boost the delivery of self-build plots in Bath and North East Somerset. The policy approaches are presented for purposes stimulating discussion to address facilitating the delivery of self-build plots:

H/SBCHB: Self and Custom Housebuilding	Option	Advantages	Disadvantages
A	Support/housing mix policy seeking to secure appropriate mix of homes on all sites, taking account of existing imbalances in housing stock, site characteristics, viability and market considerations and opportunity to facilitate Custom and Self Build schemes.	<p>Diverse Housing Stock: Encouraging a mix of homes can lead to a more diverse housing stock, addressing the needs of different demographics and lifestyles within the community.</p> <p>Market Responsiveness: Considering market conditions and site characteristics ensures that the housing supply is more responsive to the actual demands of the local population, potentially improving overall market dynamics.</p>	<p>Viability Challenges: Balancing housing mix with site viability and market considerations can be challenging. There might be situations where the desired housing mix is not economically viable for developers or self-builders.</p> <p>Complex Implementation: Implementing and enforcing a nuanced policy that considers various factors may be difficult to administer effectively.</p>

<p>B</p>	<p>Percentage policy on large sites or strategic allocations – e.g.</p> <p>Mid Devon (Policy S3) – sites of 20 or more homes to provide at least 5% serviced plots for sale to self-builders</p>	<p>Encourages Diversity: This policy promotes diversity within large developments, ensuring that not all housing is homogenous and encouraging a mix of styles and designs.</p> <p>Local Economic Benefits: Self-build projects can contribute to the local economy by supporting local businesses and contractors, leading to increased economic activity.</p>	<p>Viability Challenges: Balancing housing mix with site viability and market considerations can be challenging. There might be situations where the desired housing mix is not economically viable for developers or self-builders.</p> <p>Choice: Self-builders may not wish to be part of a larger development site or want more choice regarding the type of development that could take place on a plot.</p>
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C	Allocation of suitable sites promoted for Self/Custom Build that are in line with the spatial strategy outlined above.	<p>Strategic Spatial Planning: Allocating specific sites for self-build in line with spatial strategies ensures that self-build developments align with broader planning goals.</p> <p>Community Engagement: Identifying suitable sites through a strategic approach involves community input, fostering a sense of engagement and collaboration in the planning process.</p>	<p>Limited Flexibility: Strict allocation might limit flexibility in responding to changing market conditions or unforeseen developments.</p> <p>Land Availability Challenges: Identifying and securing suitable sites for self-build may be challenging, particularly in areas with limited available land.</p>
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Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy H/GT: Gypsies, Roma, Travellers and Travelling Show People

9.117 The NPPF (December 2023) states that the needs of groups with specific housing requirements must be addressed and this includes the needs of travellers. National policy guidance is provided in the government’s Planning policy for traveller sites (PPTS). This guidance recently updated Annex 1 (December 2023) and clarifies that Gypsies and Travellers mean any ‘persons of nomadic habit of life whatever their race or origin, including such persons who on ground only of their own or their family’s or dependant’s educational or health needs of old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.’ As well as delivering the right number of homes, the Local Plan needs to guide the size and type of homes delivered, so that they reflect the needs of different groups in the community.

- 9.118 Policy CP11: Gypsies, Travellers and Travelling Showpeople sets out a criteria-based policy for the identification and allocation of suitable, available and deliverable or developable sites in a Development Plan Document and when considering planning applications.
- 9.119 The Bath and North East Somerset Council Gypsy and Traveller Accommodation Assessment (Final Report) September 2021 (GTAA) undertaken by Opinion Research Services (ORS) on behalf of B&NES Council, set out the pitch requirement for the period 2020-2034. Although the approach and methodology to the GTAA was underpinned by the planning definition for a Gypsy, Traveller or Travelling Showperson as set out in PPTS (2015), it also included an assessment of need for households that did not meet the planning definition.
- 9.120 The 2021 GTAA set out the requirement of 12 pitches (2020-2034) to meet the need for households that meet the planning definition of gypsies and travellers. Planning application 21/04206/FUL Carrswood View permitted the change of use of three transit Gypsy and Traveller pitches to use as permanent residential pitches for Gypsy and Traveller households. This leaves a residual requirement to 2034 of nine pitches.
- 9.121 ORS in an update note to this work on pitch requirements to 2042 set out a requirement of an additional 2 pitches required to meet the PPTS planning definition. The 2021 GTAA highlights that most of the identified need comes from households living on private sites. Therefore, consideration should be given to meeting it through intensifying existing private pitches or sites.
- 9.122 An updated GTAA (comprising new household interviews) will be undertaken in early 2024 to inform the Draft (Regulation 19) Local Plan and consider the implications of the recent update to the definition of Gypsies and Travellers as set out in Annex 1 of the PPTS.
- 9.123 Based on current evidence given the limited and locally specific pitch requirements, it is proposed to take forward a criteria-based policy approach within the Local Plan in addition to National Planning Policy requirements. The criteria-based policy would include consideration of intensification of private traveller sites given local requirements. Infrastructure requirements, and specifically the need for school places, will need to be considered in relation to any sites or intensification of existing sites proposed.
- 9.124 In terms of transit pitches, the GTAA concluded that 'Due to low numbers of unauthorised encampments and the presence of designated transit pitches, it is recommended that there is no need for any additional transit provision in Bath and North East Somerset at this time.'

We are proposing to take forward a criteria-based policy approach as outlined above and we do not consider that there would be a requirement to allocate additional sites for permanent residential or transit pitches within the Local Plan.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy H/M: Moorings

Background

9.125 The NPPF encourages local planning authorities to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It is recognised that houseboats contribute to increasing diversity of homes within the District.

The NPPF further sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. The housing needs of all groups should be assessed.

9.126 Provisions set out in the Housing and Planning Act now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in, or resorting to, their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

9.127 Placemaking Plan Policy H6 covers development proposals seeking new moorings. The policy seeks to guide proposals to the most sustainable locations where there is easy access to necessary services and facilities. These include education facilities and as such the need for additional school places must be considered when assessing proposed sites for moorings.

9.128 There is an evidence-based current need for 6 permanent/ licenced moorings and a Modelled maximum need for 17 moorings based on an estimated 100 live aboard boats across the district. This need is in addition to existing moorings.

9.129 The detailed background and evidence relating to the policy is set out in the Housing Topic Paper.

Policy Approach

- 9.130 The waterways that are used for moorings primarily lie within the Green Belt (other than within the city of Bath). Appeal decisions and Court judgements have confirmed that marinas and moorings related development is inappropriate development in the Green Belt, unless it preserves the openness of the Green Belt. Given the limited scale of need for moorings and that most of the waterway lie within the Green Belt it is proposed to take forward a criteria-based policy approach within the Local Plan in addition to National Planning Policy requirements, as well as to consider the potential for additional moorings as part of the development location option at North Keynsham (see also chapter 6). The criteria-based policy would include consideration of intensification of private traveller sites given local requirements.
- 9.131 The criteria-based policy would be based on adopted Policy H6. The existing policy sets out that development involving new and additional moorings will be permitted provided they are located outside the Green Belt. As noted above most waterways situated within Bath and North East Somerset are located within the Green Belt. The adopted policy presents limitations for delivering moorings especially considering there are exceptions to development within the Green Belt set out within the NPPF.
- 9.132 It is therefore proposed to make amendments to the supporting text/policy relating to moorings development in the Green Belt. In line with national policy, it will be made clear that some limited moorings development might fall within one of the exceptions to inappropriate development within the Green Belt i.e. a material change of use of land that preserves the openness of the Green Belt.

What is your opinion of this approach, and why?

- 9.133 We are proposing to take forward a criteria-based policy approach with amended references to the Green Belt, as well as considering the potential for additional residential moorings as part of the development options at North Keynsham as outlined above.

What is your opinion of this approach, and why? What criteria should we consider?

H/M: Moorings	Option	Advantages	Disadvantages
A	Retain policy H6 with amendments.	Adopted policy presents no issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Climate Change

Policy C/RD: Sustainable Construction for New Residential Development

- 9.134 Adopted policy SCR6 currently sets limits on space heating and energy consumption in new build residential dwellings. The policy also requires energy needs to be met through on-site renewable energy to match total energy use.
- 9.135 The policy applies to all residential development including PBSA and care homes, but does not apply to extensions, conversions and other changes of use.
- 9.136 The Local Plan provides an opportunity to review how the policies are being implemented and to consider the option of setting stricter standards for space heating and energy use.

National Policy changes

- 9.137 On the 13th December 2023 the DLUHC released a Written Ministerial Statement that discourages local authorities from setting their own standards with regards to energy efficiency in homes and setting out the desired approach for sustainable construction policies. The statement specifies the metric to be used for any locally set policies should be as follows;
- 9.138 *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*
- 9.139 In addition, DLUHC are currently consulting on the Future Homes Standards which looks at changing building regulations and introducing new requirements for residential development. The aim is for new residential buildings to be 'zero carbon ready', meaning that no further work will be needed for them to have zero carbon emissions once the electricity grid has decarbonised. The standards will require heating and hot water demand to be met through low-carbon sources and fossil fuel methods will not be permitted.
- 9.140 The consultation proposes minimal changes in fabric standards from Building Regulations Part L 2021, with only option number one proposing a slight improvement in air tightness. The proposed option one includes the installation of wastewater heat recovery systems, decentralised mechanical extract ventilation and solar PV panels to cover the equivalent of 40% of ground floor area. Option two proposes none of these changes. The consultation does not state a preferred option.

9.141 The proposed changes rely on the electricity grid becoming decarbonised for new buildings to achieve zero carbon emissions and therefore, it is still considered that a policy on sustainable construction is required.

Options

9.142 The first option (A) listed below will seek to retain the current policy and not adjust the existing standards.

9.143 The second option (B) looks at setting stricter standards for space heating and energy use, whilst continuing to require energy needs to be met on site through renewables.

9.144 The third option (C) would alter the metric used from space heating and energy use intensity to a % carbon reduction from the target emission rate of the building as assessed by the standard assessment procedure (SAP) and as referenced in the recent Written Ministerial Statement. This option will also explore the addition of requiring no use of on-site fossil fuels.

C/RD: Sustainable Construction for New Residential Development	Option	Advantages	Disadvantages
A	Retain the existing standards as set out in policy SCR6.	The current policy requires a good energy efficiency standard on operational emissions.	Other LPAs are now seeking to set stricter standards and not changing the standards will mean that new homes will not be as efficient as they could be.

<p>B</p>	<p>Revise the standards to state the following;</p> <ul style="list-style-type: none"> • Space heating demand less than 15kWh/m2/annum; • Total energy use less than 35kWh/m2/annum; and • On site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV • Connection to a low- or zero-carbon district heating network where available <p>Retain the options for offsetting where energy needs cannot be met on site.</p>	<p>The policy will result in warmer more efficient homes and will contribute to addressing the climate emergency. The proposal is in line with other West of England authorities.</p>	<p>The introduction of stricter standards may increase the cost of the development to the detriment of other requirements such as affordable housing. Viability will need to be tested.</p> <p>May not align with the Witten Ministerial Statement.</p>
<p>C</p>	<p>Require a 100% reduction in carbon emissions from the target emission rate as outlined in the Standard Assessment Procedure</p> <p>No use of on-site fossil fuels</p>	<p>Closely aligns with the requirements of the Written Ministerial Statement.</p>	<p>Percentage carbon metric is not as accurate as space heating and EUI targets.</p>

Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy C/NRB: Sustainable Construction for Non-Residential Buildings

- 9.145 Adopted policy SCR7 set a new policy requiring a 100% reduction in operational carbon emissions from the buildings regulation standard in part L. The policy requires that energy efficiency should be maximised through efficient fabric and services with energy use being met through on site renewables.
- 9.146 A carbon reduction policy is not as accurate a metric as space heating and energy standards. However, it is difficult to set heating and energy use standards for non-residential buildings due to their varied typologies.
- 9.147 Option A looks at retaining the existing standards but broadening this policy to all new build non-residential buildings.
- 9.148 Option B looks at setting a space heating standard for non-residential buildings and the possibility of an energy use intensity standard.
- 9.149 Option C considers the use of BREEAM standards to assess the efficiency of the buildings in line with some other local authorities.

C/NRB: Sustainable Construction for New Non- Residential Development	Option	Advantages	Disadvantages
A	Retain the existing policy but apply the policy to all non-residential development.	The policy has been working well so far and to include all non-residential buildings will improve the standards of new building stock.	The policy uses building regulations to calculate the carbon reduction, which is less accurate than space heating and energy standards. Carbon reduction does not take account of a buildings form factor.
B	<p>Set a space heating requirement of; 15kWh/m2/annum</p> <p>Explore the possibility of setting an energy use intensity standard for different non-residential typologies.</p> <p>Continue to require energy needs to be met through on-site renewable energy generation</p>	<p>The use of space heating and EUI standards will result in a more accurate assessment of the buildings operation energy. Form factor can be taken into account.</p> <p>Changes to building regulations will not impact on the implementation of the policy.</p>	<p>Due to the variation in performance in non-residential buildings it may be difficult to set EUI standards.</p> <p>Any new standards may affect the viability of development.</p>

C	Retain the existing policy but require all major and minor applications to meet as a minimum BREEAM excellent standards	BREEAM is a widely used third party accreditation scheme. BREEAM 'Excellent' is the most common level of performance referred to, both in planning policy and corporate strategies.	The setting of BREEAM standards duplicates requirements of the existing operational energy, embodied carbon and environmental policies. BREEAM excellent does not meet a 100% carbon reduction
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Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy C/EC: Embodied Carbon

- 9.150 Adopted policy SCR8 introduced the concept of embodied carbon assessments. Embodied carbon emissions are those associated with raw material extraction, manufacture and transport of building materials, construction, maintenance, repair replacements, dismantling, demolition and eventual material disposal.
- 9.151 Policy SCR8 required an embodied carbon assessment on sub-structures, super-structures and finishes. A target of 900kgCO₂e/m² was set to be required on large scale new build development.
- 9.152 The standard in the LPPU was is relatively to reach and was seen as a cost neutral approach in order to introduce the concept of embodied carbon assessments. There is now an opportunity through the Local Plan to set a stricter standard and broaden the reach of the policy.

C/EC: Embodied Carbon	Option	Advantages	Disadvantages
A	Retain the existing standards of the policy but broaden the scope of the policy to include all new major and minor applications.	The current target is easy to reach and does not impact on the viability of development.	As the standard is easy to reach the policy will not encourage developments to use more sustainable materials.
B	<p>Alter the standards to require an embodied carbon assessment on major and minor development and require development to achieve the following standards on the sub-structures, superstructures and finishes.</p> <ul style="list-style-type: none"> • Residential (4 storeys or fewer) - <625 kgCO₂e/m² • Residential (5 storeys or greater) - <800 kgCO₂e/m² • Non-residential schemes - <900 kgCO₂e/m² 	The proposed standards will require that more sustainable materials are used in construction.	Setting stricter standards may impact on the viability of development and impact on other measures such as affordable housing.
C	Where an application is seeking to demolish a building the applicant is required to demonstrate why it is not suitable for re-use. If the building is not suitable for re use the applicant must demonstrate how they will reuse and recycle materials created through the demolition.	Buildings will only be demolished and materials disposed of as a last resort.	Setting stricter standards may impact on the viability of development and impact on other measures such as affordable housing.

Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy C/RE: Renewable Energy

- 9.153 The Council's current approach to renewable energy is set out in Policy CP3. Policy SCR4 sets out the Council's approach to and support for Community Led Projects.
- 9.154 The policy approach was reviewed through the LPPU to set out a positive approach for determining applications and guiding development to the most suitable locations.
- 9.155 The revised Policy CP3 sets out the criteria for all stand-alone renewable energy projects, as well as specific criteria for wind energy and ground mounted solar.
- 9.156 Through the LPPU, the Council has set out a landscape led approach for wind energy and ground-mounted solar PV to guide development to the best locations which is based on the Landscape Sensitivity Assessment (LSA) for Renewable Energy Development (LUC, 2021).
- 9.157 It was not possible to review the Core Strategy target for renewable energy generation through the LPPU. This Options Document presents options for how both the target and approach to CP3 could be revised to plan positively for renewable energy while ensuring that adverse impacts are addressed satisfactorily.

National Context

- 9.158 Paragraph 160 of the NPPF states that the planning system should support renewable and low carbon energy and associated infrastructure. To help increase the use and supply of renewable and low carbon energy and heat, plans should:
- Provide a positive strategy for energy from these sources that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily.
 - Consider identifying areas suitable for renewable and low carbon energy sources and supporting infrastructure.
 - Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

- 9.159 Community-led initiatives for renewable and low carbon energy should also be supported, giving consideration to the role of neighbourhood planning as well as local plans.
- 9.160 Further detailed guidance on developing policies on renewables and low carbon energy and the planning considerations involved in such schemes is provided in the Planning Practice Guidance (PPG).

Changes since adoption of the LPPU

- 9.161 Since the adoption of the LPPU there have been changes to national policy issued by the Government in relation to Wind Energy, through the release of 5th September 2023 Written Material Statement (WMS) and subsequent revision to the NPPF.
- 9.162 Through the WMS the Government is seeking to restart development of onshore wind in England. The NPPF has been revised to allow alternative ways of identifying potential locations for new wind farm developments, rather than solely local development plans. This now includes local and neighbourhood development orders, or community right to build orders.
- 9.163 There have also been changes to the wording around the test applied in relation to community backing of onshore wind, on which further guidance is expected from the Government on how public support for wind farms will be assessed, and how communities that host wind farms could benefit from lower energy bills.

Proposed Target

- 9.164 It was not possible to review the Core Strategy target for renewable energy generation through the LPPU. Consequently, a misalignment exists between the Core Strategy target and the Council's Climate Emergency goal.
- 9.165 Stretch Pathway modelling outlined in the [Council's Climate Emergency Strategy 2019-2030](#) indicates the magnitude and urgency of our ambition in Bath and North East Somerset to achieve our 2030 goal. According to the [Anthesis 2019 report, it is](#) suggested that we need a minimum additional 300MW of renewable energy to contribute to the decarbonisation of electricity, heat, and transport. Rapid and large-scale development of local renewable energy installations is essential, such as equipping 50% of existing homes with roof mounted solar PV by 2030, installing solar PV on commercial roof space equivalent to around 116 football pitches, and incorporating approximately 28 large (2.5 MW) wind turbines..

- 9.166 Through National Policy there is no prescribed way of determining how much energy should be generated from installations located within Bath and North East Somerset. However, in order to explore the implications of our Climate Emergency 2030 target on renewable energy development and to provide an indication of the scale of the challenge, refer to our evidence base, specifically the Renewable Energy Resource Assessment Study (RERAS).
- 9.167 The RERAS was commissioned, working with our partners (South Gloucestershire, North Somerset and the West of England Combined Authority (WECA)) to ensure a consistent approach across those areas. As part of this, we have projected local energy demand in Bath and North East Somerset in 2030 based on the assumption that we are living in a carbon neutral scenario.
- 9.168 The RERAS presents a 'snapshot' theoretical projection of local energy demand in 2030 in terms of Gigawatt hours (approximately [1,260 GWh](#)), and it is based on a number of assumptions. The RERAS outlines three scenarios regarding the number and mix of additional solar and wind renewable energy installations in Bath and North East Somerset to meet the projected 2030 local electricity demand.
- 9.169 However, the Council's ambition for a minimum 300MW surpasses the first two scenarios in the RERAS, and as the RERAS recommends these are presented as scenarios rather than targets, we have not included these as options within this document.
- 9.170 Given this misalignment, we believe that linking back to the Council's Climate Emergency declaration and emphasizing the 300MW minimum target is the most appropriate way forward. This approach ensures a clear connection between planning applications for renewable energy and the overarching climate targets, allowing for flexibility over the plan period in case of changes to targets or evolution in the evidence base. Notably, evidence base documents, such as the RERAS, act as snapshots in time and are based on assumptions. This strategic approach helps avoid scenarios like the LPPU policy review, where the target was set in the Core Strategy many years before the declaration of the Climate Emergency by the Council.

C/RE: Renewable Energy Target	Option	Advantages	Disadvantages
A	Flexible Target – Linking the determination of planning applications for renewable energy back to the Council’s and National climate targets.	<p>Adaptability to Changing Targets: This approach allows for flexibility, adapting to changes in national climate targets. As targets evolve, the planning applications can be adjusted accordingly, ensuring alignment with the most current goals.</p> <p>Resilience to Policy Changes: Considering the evolution of evidence over time, this approach acknowledges that policies set in the past might need adjustment. It prevents the potential pitfalls of rigid plans that don't account for changing circumstances, such as the example of the LPPU policy review.</p>	<p>Potential for Delayed Action: The adaptive nature of the approach could potentially lead to delays in implementation as planning applications may need to be revised and updated based on changing targets</p> <p>Lack of Long-Term Certainty: The flexibility introduced might create uncertainty for stakeholders, including developers and investors, who may prefer more stable, long-term targets for planning and investment decisions.</p>

Question: Do you support this approach and why?

Proposed Approach

- 9.171 Given that Policy CP3 has recently been reviewed, the policy approach could be regarded as appropriate to take forward into this Local Plan. Increased interest in Solar PV operators looking at sites within the District, such as the permitted 15MW solar farm on Marksbury Plain is noted.
- 9.172 The RERAS evidence base also includes a review of the technical potential of renewable energy technologies in the district. In particular, the study provides evidence on the potential areas for wind energy and solar PV, based on a variety of criteria and looking at factors, such as different wind turbine sizes, as required by national policy.
- 9.173 The RERAS shows that the potential opportunities and areas where large scale wind installations can effectively operate on a commercial basis are limited within Bath and North East Somerset ([Appendix 1](#)). Through this option these areas could be safeguarded so that other development which could prejudice wind energy development is not permitted.
- 9.174 It is important to stress that both the safeguarded areas and the broad areas of search (set out in the approach above) are only 'potentially suitable' for wind turbines: being within these locations does not mean that an application for a wind turbine or turbines would be approved. All applications for wind turbines would be assessed against the detailed policy criteria and all other relevant policies in this Local Plan, as well as National Policy or relevant Neighbourhood Plans.
- 9.175 Given the potential sensitivity of the areas identified (National Landscapes) through the technical assessment, it is not proposed to constrain these sites for large wind turbines only and provide a degree a flexibility on turbine size, consistent with our overall desire to increase renewable energy generation and to bring forward wind development, balanced against the need to protect environmental assets.
- 9.176 In stark contrast the RERAs shows that the solar resource is widespread across the district (Appendix 2). We consider that there would be no benefit in safeguarding these areas.
- 9.177 Options have also been presented for policy approach that could be applied to build upon the landscape led approach adopted currently in Policy CP3.

C/RE: Renewable Energy Approach	Option	Advantages	Disadvantages
A	Keep the broad areas of search approach established through the LPPU, with scope to review or add new elements (e.g., mine-water storage).	Approach recently adopted and seems to be appropriate	Broad areas of search may lack the certainty for developers or communities when looking for opportunities
B	Safeguarding of our best potential sites for wind energy	Safeguarding the best sites for wind energy ensures optimal utilisation of resources. These sites are selected based on favourable wind conditions, maximizing the efficiency and output of wind turbines.	Safeguarding specific sites for wind energy may limit alternative land uses, such as agriculture or recreation. This can lead to conflicts with other interests. The development of wind energy projects, even in optimal sites, can have environmental or landscape impacts.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Nature and Ecosystem Services

Policy N/SHS: Sites, Habitats and Species

Background

- 9.178 The NPPF expects local planning authorities to include criteria-based policies in their Local Plan against which the impact of development proposals on or affecting protected biodiversity and geodiversity can be considered. It also requires distinctions to be made between the hierarchy of international, national and locally designated sites.
- 9.179 Placemaking Plan policy NE3 Sites Habitats and Species seeks to conserve and increase the abundance and diversity of Bath and North East Somerset's wildlife habitats and species and to minimise adverse effects where conflicts of interest are unavoidable.
- 9.180 The detailed background and evidence relating to the policy is set out in the Natural Environment Topic Paper.

Policy Approach

- 9.181 The B&NES Ecological Emergency Action Plan (EEAP) sets out the Vision to be Nature Positive by 2030. The EEAP sets out three guiding priorities consisting of:
- Increase the extent of land and waterways managed positively for nature across B&NES;
 - Increase the abundance and distribution of key species across B&NES; and
 - Enable more people to access and engage with nature.
- 9.182 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding the planning balance and judgement, including measures to help increase the abundance and distribution of key species, and in general meeting the three guiding priorities of the EEAP.

N/SHS: Sites, Habitats and Species	Option	Advantages	Disadvantages
A	Retain policy NE3 with amendments as outlined above.	Adopted policy tested recently at LPPU examination. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's corporate priorities?

Policy N/BNG: Biodiversity Net Gain

Background

- 9.183 Biodiversity Net Gain (BNG) is a process designed for the planning system to make sure new development delivers a net positive impact on the natural environment.
- 9.184 The Construction Industry Research & Information Association provide a useful description of the BNG process:
- 9.185 “Enhancing biodiversity is integral to sustainable development, and BNG is an approach to embed and demonstrate biodiversity enhancement within development. It involves first avoiding and then minimising biodiversity loss as far as possible, and, achieving measurable net gains that contribute towards local and strategic biodiversity priorities” (CIRIA, C776a).
- 9.186 This clarifies a key aspect of the BNG approach which is to first avoid and then minimise biodiversity loss before considering and then calculating BNG values pre and post development. The approach therefore requires continued use of the mitigation hierarchy and existing and updated Natural Environment Policies.
- 9.187 Local Plan Partial Update (LPPU) Policy NE3a sets out development will only be permitted for major developments where a BNG of a minimum of 10% is demonstrated and secured in perpetuity (at least 30 years) subject to meeting the criteria listed within the policy.
- 9.188 The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan. This is also set out in the council’s Ecological Emergency Action Plan.
- 9.189 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

- 9.190 National Guidance sets out that plans should: “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” As such, the following options are proposed:

N/BNG: Biodiversity Net Gain	Option	Advantages	Disadvantages
A	Rely on the existing policy approach and emerging national legislation.	<p>Approach is already in place and has recently been tested as part of the LPPU examination.</p> <p>The approach responds to the Council's declared Ecological Emergency in July 2020.</p>	<p>Existing approach is limited concerning a distinction between the requirements on greenfield sites and brownfield sites.</p> <p>Further issues raised revolve around how development schemes requiring BNG will be implemented, monitored and enforced.</p> <p>Relying on a 10% minimum BNG requirement may not deliver sufficient habitat gains.</p> <p>Existing policy approach will be out of kilter with mandatory requirements for small sites after March 2024 and so will need updating to require at least 10% net gain for minor applications.</p>

<p>B</p>	<p>Require a minimum 20% biodiversity net gain on:</p> <ul style="list-style-type: none"> • Previously developed land (Major Applications) • Strategic housing sites (can then be a development requirement for allocated sites) • All major development within protected landscapes • Ground array solar farms • For all council developments. 	<p>The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan.</p> <p>The approach will increase a development's contribution to nature recovery, and as a result help to better address the ecological emergency.</p>	<p>Potential viability concerns may require weighing up or balancing benefits against other spatial priorities.</p> <p>Further work needed on sufficient evidence to justify the approach.</p>
<p>C</p>	<p>A staggered/ graded approach to BNG requirements for different schemes i.e. require a minimum 20% biodiversity net gain on all major developments, down to 10% on minor applications.</p>	<p>The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan.</p>	<p>Potential viability concerns may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>Further work needed on sufficient evidence to justify the approach.</p>

Which of the policy Options A to C do you prefer? Please say why

Would an additional policy approach be needed for influencing location of off-site gains and their proximity to point of habitat loss?

Should we be seeking a minimum of no net loss and appropriate net gain for schemes exempt from mandatory BNG?

9.191 Government guidance refers to habitats of significance but as of now this is not defined.

Do we need to define when long term management of on-site gains is required?

Policy N/GI: Green Infrastructure

Background

9.192 The National Planning Policy Framework (NPPF) defines Green Infrastructure (GI) as a network of multi-functional green and blue spaces and other natural features, urban and rural, which can deliver a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

9.193 In January 2023 Natural England published The Green Infrastructure Framework – Principles and Standards for England (GI Framework). This was a commitment in the Government’s 25 Year Environment Plan. It supports the greening of towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. The GI Framework will help local planning authorities and developers meet requirements in the NPPF to consider GI in local plans and in new development.

9.194 As part of the GI Framework Natural England has developed a set of GI Principles:

9.195 ‘The GI Principles underpin the Framework. They provide a baseline for different organisations to develop stronger GI policy and delivery. The principles cover the why, what and how to do good GI.’

9.196 In addition to principles GI Standards are outlined, which are a key component of the GI Framework. The Headline GI Standards are for use by local planning authorities and other stakeholders informed by local knowledge and evidence to:

- Develop a vision for local green infrastructure and understanding of current green infrastructure provision, needs and priorities;

- Set key local green infrastructure targets; and
- Monitor and evaluate green infrastructure provision.

9.197 The five Headline standards are as follows

- S1: GI Strategies;
- S2: Accessible Green Space;
- S3: Urban Nature recovery;
- S4: Urban Tree canopy; and
- S5: Urban Greening Factor.

9.198 The Urban Greening Factor (UGF) is a planning tool designed to improve the provision of GI and increase the level of greening in urban environments. It is designed to be applied to major developments and sets a target score for the proportion of GI within a development site for specific land uses.

9.199 B&NES local policy addresses GI through policy CP7 (adopted as part of the Core Strategy and policy NE1 (adopted as part of the Placemaking Plan).

9.200 Policy CP7 as existing requires work in partnership with key public and private bodies, local communities and the voluntary sector to protect and enhance the GI network and ensure a strategic approach is taken.

9.201 Policy NE1 requires amongst other things for major development proposals to provide a plan of the existing green infrastructure assets within and around the development site.

9.202 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

9.203 NPPF paragraph 181 sets out that plans should, amongst other things:

9.204 *'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*

9.205 Regarding the NE GI Framework Principles and Standards, the UGF is not covered under the existing policy framework for B&NES, whilst other parts of the GI Framework are covered to some extent. The B&NES GI Strategy (2013) is being reviewed and will be guided by the GI Framework. Targets and requirements will need to be supported by a robust evidence base. As such, the following options are proposed:

N/GI: Green Infrastructure	Option	Advantages	Disadvantages
A	Leave the policy as existing.	<p>Limited issues from a development management perspective.</p> <p>The policy as it is written provides flexibility and scope for Development Management Officers to negotiate.</p>	<p>There would be limited requirement for the management and monitoring of implementation of GI.</p> <p>Would be out of date with respect to government guidance NE GI Framework.</p> <p>Not well integrated with other policies i.e. BNG, landscaping, open spaces and sustainable drainage.</p> <p>Does not reference the GI Strategy – which is being updated alongside the Local Plan in line with the NE GI Framework. This document will set targets and identify the strategic GI network and priorities for GI enhancement.</p> <p>Does not reference accessible greenspace standard, urban nature recovery standard, urban greening factor and urban tree canopy cover standard (as per NE GI Framework).</p> <p>Will not meet the spatial priorities set out within the local plan.</p>

<p>B</p>	<p>New GI policy consolidating NE1 and CP7 and to include Natural England GI Framework standards. Key requirements will be to seek a GI plan, with 30-year management and monitoring for major applications. Detail to be guided by the forthcoming revised B&NES GI Strategy.</p>	<p>The approach will allow for the management and monitoring of GI, which can align with BNG, and will enable GI to contribute and support other policy objectives. This could/ should provide scope to simplify the Local Plan.</p> <p>Provides support for the delivery of the B&NES GI Strategy ambitions and targets.</p> <p>Will provide a more concise and stronger policy and presents benefits for a more concise plan.</p> <p>The option will assist in delivering greater benefits to residents, communities, and to wider society.</p>	<p>The policy approach to be taken forward will be subject to viability testing as the Draft Local Plan is prepared. There is a risk this policy option may not be viable and won't be included in the Draft Plan. This option may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>Work required to ensure sufficient evidence to justify the approach.</p> <p>Question as to whether there are resources in place for monitoring GI – whether there is overlap with BNG i.e. will this approach be covered in the BNG Plan.</p>
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C	<p>New GI policy consolidating NE1 and CP7 which presents Natural England GI Framework. With a separate policy for the GI Framework Urban Greening Factor (UGF) i.e., all major commercial/residential development to provide a locally agreed UGF Score.</p>	<p>Will help to address the council's Corporate priorities.</p> <p>The approach will require the management and monitoring of GI.</p> <p>Allows for consistency between the local plan and revised GI Strategy.</p> <p>Having an UGF will assist in securing no loss of green infrastructure.</p> <p>A separate UGF policy will give more focus to this Standard than the other 4 headline standards.</p> <p>An UGF policy can be used alongside BNG to help set the quantity and functionality of Green Infrastructure that should be delivered on-site.</p> <p>The option will assist in delivering greater benefits to residents, communities, and to wider society.</p>	<p>The policy approach to be taken forward will be subject to viability testing as the Draft Local Plan is prepared as noted for option 2.</p> <p>Having sufficient evidence to justify the approach.</p> <p>Requiring submission of UGF assessment may be considered an additional administrative burden.</p> <p>A GI policy and a separate UGF Policy will present similar issues as existing i.e., two GI related policies. Will not meet the aim of having a more concise plan.</p> <p>Would bring into question why Standard One of the GI Framework does not have a separate policy - for developers to provide a GI Plan that sets out management and monitoring of GI.</p> <p>Resourcing concerns and overlap with BNG as noted above for option 2.</p>
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Which of the policy Options A to C do you prefer? Please say why

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities?

Policy N/OS: Open Spaces

Background

- 9.206 The NPPF highlights the importance of having access to high quality open spaces and opportunities for sport and recreation.
- 9.207 Placemaking Plan Policy LCR6 indicates that where new development generates a need for additional recreational open space (“green space”) and facilities including allotments, parks and recreation grounds and play space (youth and children) which cannot be met on-site or by existing provision, the developer will be required to either provide for, or to contribute to the provision of accessible sport and recreational open space and/or facilities to meet the need arising from the new development in accordance with the standards set out in the Green Space Strategy, and Planning Obligations SPD or successor documents.
- 9.208 The detailed background and evidence relating to the following options is set out in the [Natural Environment Topic Paper](#).

Policy approach options

- 9.209 NPPF paragraph 102 sets out the following in relation to open spaces:
- 9.210 ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.’
- 9.211 As such, the following options are proposed:

N/OS: Open Spaces	Option	Advantages	Disadvantages
A	Continue with the existing approach, that being open space requirements are achieved through the implementation of policy LCR6. This will require consultation with the B&NES parks team on applications, with open space requirements set within the Green Space Strategy and Planning Obligations SPD.	The existing approach allows for flexibility, as standards are not set within policy.	As standards and requirements are set within separate documents the current approach can result in inconsistency in terms of open space provided through the planning application process.
B	Incorporate Natural England Space standards within planning policy.	Will take account of most current and up to date guidance. Setting standards within policy will allow for stronger weighting in determining applications.	Will limit flexibility should standards change.
C	Remove policy (accessible green space to be covered under consolidated GI policy).	Allows for a more concise plan overall, ensuring GI and provision of green space are covered together. The revised GI Strategy will include accessible green space standard as part of NE GI Framework approach.	May reduce scope of flexibility for achieving certain forms of open space or GI should they be considered collectively.

Which of the policy Options A to C do you prefer? Please say why

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities?

Policy N/TWC: Trees and Woodland Conservation

Background

- 9.212 The NPPF highlights trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Paragraph 136 of the NPPF notes the following regarding trees:
- 9.213 'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'
- 9.214 Placemaking Plan Policy NE6 seeks to protect the District's trees and woodland from the adverse impact of development by setting out criteria against which proposals will be assessed. The policy also seeks the appropriate retention and new planting of trees and woodlands. The policy had been updated as part of the Local Plan Partial Update to cover when development proposals may directly or indirectly affect veteran trees.
- 9.215 Placemaking Plan policy D4 requires, amongst other things, for development to be well connected and when proposed, street trees and green spaces should contribute to a network of GI and should be adequately sited to promote connectivity for people and wildlife. Further details on this policy are covered under the Heritage and Design section.
- 9.216 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

9.217 Trees are an important part of our natural life support system: they have a vital role to play not just in the sustainability of our urban and rural areas, but as an important component of green infrastructure networks. The NPPF requires authorities to make new streets tree-lined. Natural England (NE) have released a tool to help towns and cities turn greener. A standard within the tool promotes an increase in tree canopy cover in urban environments. In addition to these requirements emphasis should also be placed on the need to apply the 'right tree, right place' principle as set out within the 'Urban Tree Manual' developed by the Forest Research Policy & Advice Team. The following options are proposed in relation to policy NE6:

N/TWC: Trees and Woodland Conservation	Option	Advantages	Disadvantages
A	Rely on the existing policy approach supplemented by national planning policy.	As identified changes to the NPPF are not currently addressed by existing policy there would be limited benefit to keeping local policy in its current form.	Will not take account of most current up to date local requirements.
B	Amend the existing policy to avoid crossover with other policy, to include a requirement for new street lined trees, a locally agreed tree canopy cover target, and incorporate the 'right tree, right place' principle.	<p>Will take account of most current and up to date guidance set out within the NPPF and NE GI Framework. A target for the GI Framework Standard 5: Urban tree canopy cover will be identified in the revised GI Strategy.</p> <p>The option will assist in developments becoming climate-resilient, improve residents' wellbeing, and benefit nature.</p>	<p>The approach taken forward will be subject to viability testing as the Draft Local Plan is prepared. A risk this policy option may not be viable and won't be included in the Draft Plan. This option may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>The NE Urban Tree Canopy Cover Standard does not cover the establishment of new trees. There is a need to ensure trees are successfully established through an initial maintenance period once planted.</p>

Which of the policy Options A to C do you prefer? Please say why

Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities?

Policy N/CELLC: Conserving and Enhancing the Landscape and Landscape Character

Background

- 9.218 The National Planning Policy Framework (NPPF) requires local authorities to take a criteria-based approach to protecting the landscape. This approach requires an understanding of landscape character that is valued and an understanding of the significance of landscapes and their components rather than just carrying out a crude check whether the landscape is designated or not. The established process of landscape character assessment is the key tool for guiding decisions.
- 9.219 Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the District.
- 9.220 The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements.
- 9.221 Policy NE2B provides specific control over the enlargement of residential curtilages. Such enlargement can, depending on the circumstances, have a detrimental effect on the special landscape qualities and character of the area and lead to 'suburbanisation' of the countryside.
- 9.222 The detailed background and evidence relating to the policy is set out in the Natural Environment Topic Paper.

Policy Approach - Proposed Options Policy NE2

- 9.223 Policy NE2 remains fit for purpose. The current policy accords with national policy and local strategies, however, changes could be incorporated to ensure the policy has clear links to wider natural environment policy, including reference to non-designated landscapes. The policy remains fit for purpose.

N/CELLC: Conserving and Enhancing the Landscape and Landscape Character	Option	Advantages	Disadvantages
A	Retain policy NE2 with amendments to reference non-designated landscapes.	Adopted policy tested recently at LPPU examination.	None identified.

Do you think it is appropriate to retain this policy, with slight amendments, to include reference to non-designated landscapes? Please give your reasons.

Policy Approach - Proposed Options Policy NE2A

9.224 Policy NE2A remains fit for purpose and appears effective in use. The current policy accords with national and local strategies. The policy seeks to ensure that only development which conserves and enhances the landscape setting of a settlement takes place and that development which would adversely affect the setting is not permitted. The currently defined landscape setting of individual settlements are also considered to be effective and justified. However, through this consultation there is an opportunity to identify whether the boundaries of any existing landscape settings identified on the policies map should be amended. [Link to the policies map.](#)

9.225 Regarding landscape setting the following questions are proposed:

Do you think all of the current settlement settings and boundaries on the map are justified and effective? If not, would you change any existing settings, or identify and add new ones? Please give your reasons.

N/CELLC: Landscape Setting of Settlements	Option	Advantages	Disadvantages
A	Retain policy NE2A with amendments.	Adopted policy is well used by Development Management in determining planning applications. No evidence to suggest major changes are required.	None identified.

Policy Approach - Proposed Options Policy NE2B

9.226 Policy NE2B (extension of residential gardens in the countryside) remains fit for purpose. The current policy accords with national and local strategies. The policy is therefore, included in the policies listed in Appendix 1 as being retained without any changes.

**Do you agree that we can retain this policy without any changes?
Please give your reasons.**

Policy N/FRSD: Flood Risk Management and Sustainable Drainage

Background

9.227 The NPPF requires for new development to be in sustainable locations, at the least risk of flooding, taking into account vulnerability to flooding. Appropriate mitigation should be provided where necessary to ensure that development remains safe, resilient to the impacts of flooding, and does not increase the risk of flooding elsewhere.

9.228 Existing Policy CP5, in line with the NPPF, seeks to avoid inappropriate development in areas at risk of flooding and directing development away from areas at highest risk.

9.229 Placemaking Plan Policy SU1 covers sustainable drainage systems (SuDS), which are a key component of managing surface water. SuDs re-create the benefits of natural drainage systems and collect, store, slow and treat the quality of surface water to mitigate the impacts of development on run-off rates, volumes and quality. SuDS can be implemented through natural/open water means which presents multiple benefits, such as enhancing biodiversity and creating amenity space with health and well-being benefits.

9.230 The detailed background and evidence relating to the following options is set out in the [Natural Environment Topic Paper](#).

Policy approach options

9.231 National Guidance and associated Technical Guidance provides the national requirements in terms of the Sequential and Exception Test, the need for planning applications to be supported by a Flood Risk Assessment, and the priority given to utilising sustainable drainage techniques in new development.

9.232 Going further there are opportunities to present robust links with GI policy and landscape. The use of open water/ natural SuDS will present key links with nature-based solutions which is a target set out under the Natural England Green Infrastructure Principles and Standards. This matter is covered further under the approaches and options sought for policy NE4. In addition, exploring how minor applications can efficiently manage property-level rainwater management through a requirement for local capture, re-use and discharge back to the environment.

9.233 As such, the following options are proposed:

N/ FRSD: Flood Risk Management and Sustainable Drainage	Option	Advantages	Disadvantages
A	Rely on the existing policy approach supplemented by national planning policy.	The existing approach is well understood and implemented by Development Management in determining planning applications.	<p>Increased local concern relating to surface water runoff presented by developments when using the existing policy.</p> <p>Regarding major schemes the up take in natural/open water SuDS is limited as it is often achieved in underground infrastructure with small ponds implemented.</p> <p>The management of rainwater has not been considered holistically due to the fragmented ownership of its management.</p>

B	<p>Requiring that SuDS are constructed for the disposal of surplus rainwater, regardless of the size of new developments, and that there should be no net increase in rainwater discharged to combined sewers.</p>	<p>Opportunity to link the implementation of SuDS with Green/ Blue Infrastructure and BNG within wider site design. Options for Urban Greening which are being explored can provide links to better SuDS design.</p> <p>The revised GI Strategy will evidence where new or enhanced GI is required to address water management. The GI Policy if revised will reference the NE Green Infrastructure Framework standards including the Urban Greening Factor that seeks to retain and ideally increase more permeable surfaces.</p> <p>Will ensure that developments are not worsening water quality and thereby not increasing pressure on in-river ecology.</p>	<p>Whether there is sufficient evidence for justification regardless of the size of new developments.</p>
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Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy N/ES: Ecosystem Services

Background

- 9.234 The NPPF paragraph 180 b) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other things:
- 9.235 'Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'
- 9.236 Placemaking Plan Policy NE4 seeks to protect and enhance supporting services, provisioning services, regulatory services and cultural services.
- 9.237 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

- 9.238 Natural England (NE) have released a tool to help towns and cities turn greener. A standard within the tool promotes urban nature recovery. This standard aims to boost nature recovery, create and restore rich wildlife habitats and build resilience to climate change, while incorporating nature-based solutions, including trees and wildflowers, into the design of towns and cities will increase carbon capture, prevent flooding and reduce temperatures during heatwaves. As such, the following options are proposed:

N/ES: Ecosystem Services	Option	Advantages	Disadvantages
A	Leave policy as existing.	Limited issues from a development management perspective.	The existing policy is currently underused and general in its approach.
B	Adapt policy NE4 to better address/require a nature-based solutions approach as set out within NE GI Framework – Principles and Standards.	<p>Will take account of most current and up to date guidance set out within NE GI Framework, particularly promoting the need to manage and enhance natural assets.</p> <p>Will ensure that developments are maximising benefits for people and nature and are contributing to nature's recovery.</p>	Need to provide sufficient evidence for justification.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy N/EN: Ecological Networks & Nature Recovery – Local Nature Recovery Strategies

Background

9.239 The NPPF paragraph 180 d) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other things:

‘Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’

9.240 The NPPF further sets out under paragraph 185 a) to protect and enhance biodiversity and geodiversity, plans should:

‘Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.’

9.241 In addition to the requirement in the NPPF for mapping Ecological Networks, the Government have set out through the Environment Act 2022 ‘a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature’s recovery and provide wider environmental benefits’, the system being named Local Nature Recovery Strategies (LNRS). A LNRS is currently being prepared covering the West of England (Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire).

9.242 Placemaking Plan Policy NE5 (updated as part of the LPPU) seeks to ensure development proposals demonstrate a positive contribution will be made to regional Nature Recovery Networks. The policy also seeks the maintenance or creation of local ecological networks through habitat creation, protection, enhancement, restoration and/or management. Existing mapped networks are displayed on the councils Policies Map.

9.243 The West of England LNRS will also have a role in Biodiversity Net Gain by defining areas of strategic importance and providing a ‘strategic multiplier’ of 15% to BNG Units.

9.244 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

9.245 Once the LNRS is published it will be necessary for local plans to ‘take account’ of them and recognise their significance. Policy NE5 will need to be updated to take account of these forthcoming changes. As such, the following options are proposed:

N/EN: Ecological Networks	Option	Advantages	Disadvantages
A	Adapt policy NE5 to address the forthcoming Local Nature Recovery Strategy as it relates to B&NES and the wider West of England area.	<p>Will take account of most current and up to date/ emerging priority networks.</p> <p>Will ensure alignment of the Local Plan with legislation.</p>	Full national guidance on LNRS delivery is not currently available.

Question: Do you support this approach and why?

Green Belt

Policy GB/GB

Background

- 9.246 The National Planning Policy Framework (2023) has introduced some changes in the way that Green Belt should be considered. Through the LPPU we have recently reviewed adopted policies relating to Green Belt against the revised NPPF and consider that they remain consistent with National Policy. As such no changes are proposed to policies CP8, GB1 and GB3.
- 9.247 Policy GB2, in relation to infilling in villages washed over by the Green Belt, was updated through the LPPU and while we consider that the policy is consistent with national policy the Options document gives the opportunity for the approach to be tested further in response to comments made during engagement in preparing the Options document.

Policy Approach Options

- 9.248 The comments received highlight the importance of making sure that new developments provide smaller homes that meet the local demand or need, rather than building large or detached houses which often do not meet local need and may change the character of villages. In relation to Policy GB2, an option is therefore set out where the policy requires applications for infill development to demonstrate that they're offering housing that meets the specific needs of the local area, based on robust evidence. To meet this requirement, a parish would need to carry out a survey to understand the housing needs within their village. If they don't do this, applicants would have to rely on a broader District-wide assessment called the Local Housing Needs Assessment.

GB/GB: Infilling in the Green Belt (existing GB2)	Option	Advantages	Disadvantages
A	Retain policy as existing.	Accords with the NPPF in that limited infilling in villages within the Green Belt is not regarded as inappropriate development, infill boundaries have been defined in the LPPU in consultation with parish councils for all villages washed over by the Green Belt.	None identified
B	Amend policy to require that applications for infill development to demonstrate that they're delivering housing that meets the specific needs of the local area	Helps maintain village character. Development meeting existing needs.	May be seen as too restrictive

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Jobs and Economy

Policy J/O: Office Development and Change of Use

Background

- 9.249 The Council's Economic Strategy seeks to support and enable the Bath and North East Somerset economy to become more prosperous, sustainable and fairer. In order to help improve economic performance and drive moves towards greater innovation and a more creative economy there needs to be sufficient space for businesses to thrive. This includes office space suitable for modern occupiers. The National Planning Policy Framework (2023) paragraph 85 also states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 9.250 Evidence shows that the net requirement for office floorspace in B&NES is between 91,000 and 94,000 sq m. The majority (around 75%) of the office floorspace and land requirement forecast across B&NES is in Bath City.
- 9.251 Changes in the Use Class Order and the new Class E use 'Commercial, Business and Service' combines former B1 Use Classes with a number of former uses commonly found in town centres. This introduction of the E Use Class allows the change of use to other uses within the Class E use without the need for planning permission. In addition, with Permitted Development Rights for change of use from Class E to residential, there is increasing pressure for redevelopment of office stocks to other uses. However, it is important to note that permitted development rights do not apply in World Heritage Sites, i.e. Bath, or in the case of Listed Buildings.
- 9.252 The phased introduction of Minimum Energy Efficiency Standards (MEES) requirements means that since April 2023 it is an offence to continue to let non-domestic properties with an Energy Performance Certificate (EPC) rating below E. It is uncertain at this point whether this will reduce replacement rates as buildings are refurbished and thus their useful life extended or will drive an increase in replacement rates as buildings cannot be improved sufficiently to meet increasing standards.
- 9.253 In addition to the regulations requiring energy efficiency, older stocks are less likely to be able to accommodate modern infrastructure such as Heating Ventilation, and Air Conditioning (HVAC), electricity supply etc. and the demands of the market can shift, meaning that office stock can be no longer of a desirable quality or location.

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- 9.254 Evidence suggests overall the trend in the market is of a 'flight to quality', driven by the need to demonstrate ESG (environmental, social and governance) credentials and the need to provide a high quality offering to attract staff to workplaces post pandemic, including through excellent access to amenities. The effect of this is that poorer quality space is expected to struggle within the market without significant refurbishment. This becomes even more challenging in locations that do not offer worker amenities.
- 9.255 Evidence suggests that whilst there is a degree of uncertainty relating to occupier space needs, it is anticipated that as lease events, including for example rent reviews, break clauses, lease renewals/ends, occur, there will be a move to consolidate or upgrade space. The theme is an exchange of quantity for quality that needs to be facilitated through planning policy. This could mean a further release of poorer quality stock back to the market coupled with increased take up of and demand for high quality (or grade A) space leading to reduced availability and pressure on the best quality space.

Policy approach options

- 9.256 The NPPF requires that Local Plans should be prepared with the objective of contributing to the achievement of sustainable development "and make sufficient provision for among other uses employment, and other commercial development".
- 9.257 The stock of office floor space in B&NES needs to be managed, upgraded and increased to enable the delivery of the identified need for offices, and the Council's Economic Strategy.
- 9.258 It is acknowledged that occupiers seeking office space have mixed quality and specification requirements. Large companies seek better quality accommodation, but some smaller occupiers require cheaper space. Changes to government legislation on EPC certification requirements for commercial buildings may lead to cheaper offices becoming unlettable. Whilst larger and well backed companies will take grade A space, and start-ups/micro business will be able to look at the serviced office sector, cost-conscious companies that need their own office may not have options.
- 9.259 Therefore, the policy approach is to encourage the development of Grade A offices to meet the need for high quality floorspace, and upgrading of Grade B offices. With regard to smaller premises within Georgian buildings these should not be retained where they are of poor quality, however retaining some Georgian stock will provide diversity in supply and meet the needs of certain small occupiers and sectors. Hence, we need to ensure that the policy can protect office stock on a case by case basis.
- 9.260 The following options in relation to protecting office development from change of use to other higher value uses is as follows:

J/O	Option	Advantages	Disadvantages
A	<p>Not permit redevelopment / change of use to residential, (including all types of residential plus Purpose Built Student Accommodation) unless it can be robustly evidenced that:</p> <p>a) the site is of poor quality; and</p> <p>b) no longer suited to current or future business needs; and</p> <p>c) there is a lack of demand for office use; and</p> <p>d) there is a supply of available alternative premises in the locality, suitable for any displaced existing occupiers or potential occupiers looking for premises in the locality.</p> <p>In the case of redevelopment change of use to non residential (non Class E) uses, the above criteria would apply. In addition, the proposal will be required to secure suitable alternative employment opportunities of at least equivalent economic benefit.</p> <p>Issues to be taken into account will be site information including access considerations, EPC maintenance costs, the cost and ability to upgrade the floorspace, and rental information</p>	<p>In order to meet the Objectively Assessed Need (OAN) for offices the Council needs to take a number of approaches, including provision of high quality office space. Key to the provision of the office space is the need to protect the office floorspace that we have from redevelopment and change of use to higher value uses, in particular residential.</p> <p>The Council notes that there may be circumstances where the loss of some business floorspace, in particular period properties, may be acceptable, but these circumstances can be considered on a case by case basis.</p> <p>The loss of all smaller offices would run counter to the objective to maintain a diverse business sector.</p>	<p>The need for consistent information to ensure a consistent approach in implementing the policy.</p> <p>The Council recognises that planning permission is not required for changes of use within the E class, and permitted development rights exist outside Bath. The policy will reflect this.</p>

B	Above option together with adding the requirement to demonstrate there is a lack of demand for office use by a marketing statement and evidence of marketing for 12 months	This serves to provide actual market evidence of the level of demand on an objective basis.	There is a need to ensure that developers are not manipulating the marketing process.
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Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Policy J/I Strategic Industrial Locations and Locally Significant Industrial Sites Policy

Background

- 9.261 The Council's Economic Strategy seeks to support and enable the Bath and North East Somerset economy to become more prosperous, sustainable and fairer. In order to help facilitate economic prosperity and moves towards greater innovation and a more creative economy there needs to be sufficient space of varying types and scales for businesses to thrive in both well established, growing and emerging sectors. The NPPF requires that Local Plans should give significant weight to supporting economic growth and productivity. Evidence shows that there is a need for significant industrial and warehousing floorspace in the District to meet economic needs, and to accord with the Economic Strategy objectives. It is forecast that there is a need for in the range of 53,000-78,000sq m net additional industrial floorspace across the district, and circa 83,000sq m of warehousing /logistics floorspace.
- 9.262 The monitoring data shows a significant net loss in industrial floorspace during the current plan period. Due to high land values, particularly in Bath, there are continuing pressures for the redevelopment of existing employment sites for other higher value uses, particularly residential. At the same time, evidence shows that demand for industrial space has increased. However, there are limited site opportunities to provide new industrial floorspace, particularly in Bath. Therefore, it is important to ensure that existing sites are adequately protected to support the economy given the acute need for further industrial/ distribution space and to encourage the renewal and intensification of existing sites.

Policy Approach

- 9.263 The policy approach is to safeguard strategic and locally significant industrial sites due to their economic importance to the district and in order to support a diverse and inclusive economy.

9.264 The aim is to reserve these areas for industrial, distribution and related uses only. The areas are suitable for the retention and renewal of industrial and warehousing premises and are able to accommodate a wide range of sectors including research and development (use class E(g)(ii)), creative industries, health and life sciences and a variety of general industry (Class E (g)(iii) and B2 together with warehousing/ last mile logistics (B8).

9.265 The proposed approach in relation to new industrial development and the protection of sites is as follows:

J/I: Strategic and Locally Significant Industrial Sites	Option	Advantages	Disadvantages
A	<p>Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8),and builders merchants will be acceptable in principle within Strategic and Locally Significant Industrial Sites</p> <p>Development involving the loss of industrial and distribution floorspace/land will not be permitted unless the development is for a use referred to above; and would not have an adverse impact on the operation of the remaining premises, site. (Refer to Appendix 2 for list of industrial sites to be protected)</p>	<p>This would assist in meeting the forecast need for industrial and warehousing /last mile logistics uses and facilitating the forecast job growth within the Plan period. This reflects the priorities of the Economic Strategy, supports the growing economic sectors and aligns with housing growth.</p>	<p>We recognise that a change of use of one Class E use to another is not development which requires planning permission. It is in some cases beyond the planning system to resist the loss of Class E light industrial uses to other Class E uses.</p>

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy J/UI Undesignated Industrial sites Policy

Background

9.266 Reflecting the latest national policy (NPPF 2023) and the significant losses of industrial land that have occurred in the current Local Plan period; and the increased demand for industrial accommodation; there is an established need for industrial premises in the district and a chronic shortage, particularly in Bath. To help meet this need, all existing industrial and warehousing premises should be protected from redevelopment to higher value uses, in particular residential. Many of the existing smaller scale industrial and warehousing premises are within residential areas or closely related to villages and hence serve a local need and are easily accessible to communities enabling the potential for active travel, and the reduction in commuting distance.

Policy Approach

9.267 In light of the chronic shortage of industrial and warehouse premises, we propose to strengthen the policy on non-designated industrial sites to provide greater policy protection. In particular, we will require evidence to demonstrate that tenants have not been served notice with a view to redevelopment, and premises have not been run down by a lack of maintenance with a view to redevelopment to higher value uses. There may also be the potential to redevelop or intensify the use of some of these sites for industrial and warehouse uses and this will be acceptable in principle. In order to assist with the viability of redevelopment or intensification it may be necessary to incorporate an element of higher value uses. Subject to other policies higher value uses may be acceptable as an element of a proposed scheme, but only where there is no net loss of floorspace on the site that is currently used for or, if vacant, last used for industrial and warehousing purposes. In addition, the higher value uses will exclude Purpose Built Student Accommodation.

9.268 Our proposed policy approach is outlined as follows:

J/UI: Undesignated Industrial Sites	Option	Advantages	Disadvantages
A	<p>Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8), builders merchants will be acceptable in principle.</p> <p>A number of criteria will need to be demonstrated in the case of development involving the net loss of industrial and warehousing/logistics floorspace, including:</p> <ul style="list-style-type: none"> - if the premises are vacant the reasons for vacancy -evidence that the site has not been made purposefully vacant; -details of maintenance demonstrating that the site has not purposefully been left to disrepair; -viability assessment which considers the ability of the current or alternative employment use to continue; - marketing evidence to enable the determination of whether there is genuinely no demand to continue in its current planning use; and marketing for one year based on a protocol to be set out. <p>The criteria relating to ensuring that the development does not adversely affect remaining industrial uses would be retained.</p>	<p>This would assist in meeting the forecast need for industrial and warehousing /last mile logistics uses and facilitating the forecast job growth within the Plan period. This reflects the priorities of the Economic Strategy, supports the growing economic sectors and aligns with housing growth.</p>	<p>We recognise that a change of use of one Class E use to another is not development which requires planning permission. It is in some cases beyond the planning system to resist the loss of Class E light industrial uses to other Class E uses.</p>

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Policy J/EM: Employment and Skills

Background

- 9.269 The NPPF states at para 86 that planning policies should “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”
- 9.270 The council’s Economic and Health & Wellbeing Strategies are committed to providing opportunities for residents to be able to access and thrive in good work and tackling issues of worklessness, inequality and the effects that this can have on the health and wellbeing of residents. The council is also preparing a Business and Skills Plan which functions to deliver on three of the core objectives of the Economic Strategy - Good Work, Resilient Business and Inclusive Innovation. Overall, the Business and Skills Plan will focus on delivering sustainable, inclusive growth, enabling residents and businesses to meet their full economic potential in our district. Success will be measured by monitoring progress against a range of outcomes including: relative wage growth, lower NEET (Not in Employment, Education or Training) rates, improved staff retention. The Plan includes a delivery and implementation plan to ensure focus over its three year timeframe. The Planning Obligations Supplementary Planning Document sets out requirements for Targeted Recruitment and Training. This was updated to reflect implementation of the Local Plan Partial Update 2023 policies.

Policy Approach

- 9.271 In order to reinforce the Council’s objective of delivering sustainable and inclusive growth and securing a workforce with the necessary skills to ensure a prosperous economy and having regard to the Planning Obligations SPD, it is proposed to have a new policy encouraging the provision of training schemes.

J/EM: Employment and Skills	Option	Advantages	Disadvantages
A	Require an Employment, Apprenticeship and Training Plan, and financial contribution having regard to the Planning Obligations Supplementary Planning Document, for all developments of 10 or more Residential and Extra Care units and all Commercial Premises (including Purpose Built Student Accommodation and Care Homes) of over 1,000sq m, to be prepared in partnership with B&NES Council	This will assist in supporting inclusive and sustainable economic growth and have health and wellbeing benefits.	None identified.

Do you support with this approach? Please say why, and add any extra comments about this policy that you would like to make.

Healthy and Vibrant Communities

Policy HVC/TC

Retail Hierarchy and Development

- 9.272 The NPPF states that planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability; define the extent of town centres and primary shopping areas and set policies which make clear which uses will be permitted in such locations.
- 9.273 The retail and leisure sector is undergoing a period of unprecedented change particularly affected by the continued rise of online shopping and home delivery. Town centres are having to evolve to become more than simply a place to shop, presenting themselves as multi-purpose destinations and increasingly places for leisure.
- 9.274 A key aspect of sustainable communities is good access to shops and other local services which help meet the day-to-day needs of local communities. It is therefore important that both new and existing communities have easy access to facilities, to reduce the need to travel and to maintain vibrant and viable centres. Local shopping is also important as it provides options for active travel.
- 9.275 Within Bath and North East Somerset there are a number of centres that serve different roles. Bath city centre acts as a sub-regional shopping and employment centre and is a major visitor destination; Keynsham, Midsomer Norton and Radstock town centres serve the residents of the respective towns and the surrounding catchment areas, Moorland Road District Centre acts as a key centre for the south west of Bath, and the local centres primarily serve local needs within the urban and rural parts of the District. The City Centre and Town Centres have Primary Shopping Areas designated which are the focus for new retail development.
- 9.276 The purpose of designating centres and defining their boundaries is to ensure their successful future functioning as the economic and social focal points of communities, maintaining and improving their vitality and viability and enabling a compatible mix of uses within them.
- 9.277 The NPPF no longer requires Primary Shopping Frontages to be identified in centres. As the new Class E use class covering 'Commercial, Business and Service' uses does not distinguish between shops, restaurants and other business and service uses, the practical application of focusing shops (former A1 use class) within a primary shopping frontage designation is no longer appropriate.

- 9.278 However, Primary Shopping Areas, where there is a contiguous concentration of main town centre uses, are still required to be the focus for retail development, and the Primary Shopping Area boundary forms the boundary for applying the sequential test (town centre first) policy for retail proposals.
- 9.279 The Primary Shopping Area will be the main focus, particularly at ground level, for active uses that attract pedestrians to the centre for example shops and restaurants (Refer policy option relating to Development within Bath and North East Somerset's Town, District and Local Centres below). The area outside the Primary Shopping Area but within Bath City Centre and the Town Centres are proposed for a wider diversity of main town centre uses including for example offices, hotels, leisure uses. Having regard to this, there are locations where it is considered that the Primary Shopping Area in Bath should be extended to maintain and provide active frontages, in particular within Bath City Centre along Walcot Street which has a specialist retail role, supplementing the city centre retail offer; and along James Street West, Bath which was identified as a location to extend the retail, food and drink offer within the City Centre, and contribute to the vitality and viability of the City Centre.
- 9.280 It is acknowledged there are significant differences between local centres, particularly in terms of their function, layout and scale. This reflects the fact that centres have developed and evolved over time, as has the way in which communities use these centres. It is recognised that there is a degree of separation and fragmentation of uses within some local centres due to residential units being located between main town centre uses, however, overall the main activity within the centres is grouped together and concentrations of main town centre uses collectively represent a visible and functional centre. Having regard to the future growth areas there will be potential for new local centres. A Retail Assessment that considers the quantitative and qualitative needs of the district and growth areas will inform the draft Local Plan.

Policy approach options

- 9.281 The approach is to retain the retail hierarchy policy as set out in the Core Strategy policy CP12, however, adapted to ensure that the 'Development in Centres' policy makes clear which uses will be permitted in such locations.
- 9.282 Bath City Centre should remain the principal sub-regional centre and the three existing town centres – Keynsham, Midsomer Norton and Radstock - should continue to be designated as town centres in the Local Plan.

- 9.283 The Primary Shopping Area within Bath City Centre should be extended to include Walcot Street (that part currently outside the Primary Shopping Area and the Local Centre designations), which has a specialist retail function and active ground floor uses contributing to the character, vitality and viability of the core Primary Shopping Area. In addition, it is proposed that the Bath City Centre Primary Shopping Area is extended to incorporate James Street West, enabling an extension of the core retail area of Bath and maintaining and requiring active uses at ground floor to contribute to the vitality and viability of the centre.
- 9.284 Other locations outside Primary Shopping Areas but within Bath City Centre and Keynsham, Midsomer Norton, and Radstock Town Centres where active ground floor uses should be maintained / provided within the centres may be identified for the Draft Local Plan.
- 9.285 As a result of the changes to the use class order (in particular Class E use) and having regard to some changes of use and other developments since the Placemaking Plan was adopted, there are changes required to some of the local centre boundaries. Some units are proposed to be added to the centre designation as they are considered to make a contribution to the successful functioning of the centre, and in other instances some units are proposed to be removed from the designated centre due to a change of use to a non-town centre or Class E use.
- 9.286 The emerging policy for the retail and town centre hierarchy is as follows:

HVC/TC: Town Centre Network and Hierarchy	Option	Advantages	Disadvantages
A	<p>Adapt Policy CP12 Centres and Retailing to focus on the retail hierarchy.</p> <p>Update the Bath City Centre Primary Shopping Area to include Walcot Street, and James Street West, Bath.</p> <p>Revise district and local centre boundaries listed below. Refer to Appendix 3 for detailed changes:</p>	<p>Extending the Primary Shopping Area will ensure that active ground floor uses are maintained or provided thereby contributing to ensuring the vitality and viability of Bath city centre.</p> <p>The boundaries will be in line with changes and revisions to the Use Class Order, for example health clinics are now a Class E use.</p>	None identified.

	<p>Proposed Changes to designations within the following Centres (see maps in Appendix 3):</p> <p>Batheaston Local Centre</p> <p>Camden Road and Fairfield Road Local Centre</p> <p>The Avenue, Combe Down Local Centre</p> <p>Larkhall Local Centre</p> <p>Chelsea Road Local Centre</p> <p>Nelson Place East & Cleveland Place Local Centre</p> <p>Odd Down (Frome Road Local Centre and Upper Bloomfield Road Local Centre)</p> <p>Walcot Street Local Centre</p> <p>Weston High Street Local Centre</p> <p>Widcombe Local Centre</p> <p>Keynsham - Queen's Road Local Centre</p> <p>Saltford Local Centre</p> <p>Paulton Local Centre</p> <p>Peasedown St John Local Centre</p> <p>Batheaston Local Centre</p> <p>Chew Magna Local Centre</p> <p>Whitchurch Local Centre</p>	<p>To take into account Class E uses and main town centre uses not currently identified within the centres, and units which are no longer appropriate for designation, for example where there has been a redevelopment to residential use.</p> <p>The NPPF is clear that a town centre, including local centres, should be an area that is predominantly occupied by main town centre uses.</p>	<p>None identified.</p>
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	<p>Minor changes</p> <p>Moorland Road, Bath District Centre</p> <p>Margaret's Buildings Local Centre</p> <p>Twerton High Street Local Centre</p> <p>Retain with no changes the following local centres:</p> <p>Julian Road, St James Square Lansdown Road, London Road Bathwick Street, Bathwick Hill, Bear Flat, Bradford Road, Mount Road</p> <p>Lower Bristol Road (currently designated on the Policies Map but not within policy text)</p> <p>Keynsham – Chandag Road</p> <p>Westfield</p> <p>Timsbury</p> <p>Bathampton</p>		
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Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Policy HVC/TCD- Development within Bath and North East Somerset's Town, District and Local Centres

Background

- 9.287 The NPPF states that planning policies should set out policies which make clear which uses will be permitted in the centres within the hierarchy.
- 9.288 Changes in the Use Class Order and the new Class E use 'Commercial, Business and Service' combines a number of former uses commonly found in town centres, in particular shops, restaurants, health clinics, offices, some leisure such as gyms into a single Use Class E. Public houses, and entertainment venues for example cinemas, theatres and nightclubs and hot food takeaways and betting shops are not within a use class (sui generis) and therefore would need permission for any change of use. The Government noted that the reforms were primarily aimed at creating vibrant, mixed use town centres by allowing businesses greater freedom to change to a broader range of compatible uses which communities expect to find on modern high streets, as well as more generally in town and city centres.
- 9.289 The NPPF no longer requires Primary Shopping Frontages to be identified in centres. As the new Class E use class does not distinguish between shops and other business and service uses, the practical application of focusing shops (former A1 use class) within this designation is no longer appropriate. However Primary Shopping Areas, where there is a contiguous concentration of main town centre uses, are still required to be the focus for retail development, and the Primary Shopping Area boundary forms the boundary for applying the sequential test (town centre first) policy.

Policy approach options

- 9.290 As stated above the Primary Shopping Frontage policy including policy map designations and related requirements in Policy CR3 is no longer aligned to national policy and use class E. Therefore, Primary Shopping Frontages are not proposed to be defined in this Local Plan. In relation to development in town centres, the proposed policy identifies the approach in Primary Shopping Areas and within district and local centres. Flexibility and diversity, and maintaining active ground floor uses is a key consideration in the policy approach. Outside the Primary Shopping Areas flexibility and supporting a diversity of town centre uses is also important. Within Conservation Areas and in Listed Buildings there is also increased control based on the character of the area and shop frontages.

The proposed approach is as follows:

HVC/TCD: Development within Centres	Option	Advantages	Disadvantages
A	<p>Adapt policy CR3 to delete reference to Primary Shopping Frontages.</p> <p>Provide criteria for development in Primary Shopping Areas (PSA), and District/ Local Centres.</p> <p>Maintaining or providing an active ground floor use/ frontage within Primary Shopping Areas. Not fragment any part of the Primary Shopping Area by creating a significant break in the active frontage.</p> <p>In the case of District and Local Centres, ensuring that the overall function of the centre in providing day to day needs is not undermined, and retains active ground floor uses and generates footfall to the centre.</p>	<p>Maintaining and enhancing the retail function of centres is important in enabling residents and visitors to meet their shopping needs in the most sustainable way, in the most accessible locations.</p> <p>Encouraging the use of upper floors for offices, residential and other use via mixed uses, will make best use of land, capitalising on the availability of services within walking distance, and accessibility by public transport.</p>	None identified.

Question: Do you support this approach and why?

Please say why, and add any extra comments about this policy that you would like to make.

Policy HVC/LS Dispersed Local Shops

Background

- 9.291 Outside the centres identified in retail hierarchy there are many small shops throughout the District both within the urban areas and in villages. These can often serve day to day needs and offer valuable social and community benefits, but a wide range of factors has contributed to a gradual reduction in the number of such units, including viability.
- 9.292 A new Use Class F2 Community Uses has been introduced which is separate from Class E (Commercial, business and service) use. The Government recognises the importance of small, local shops in meeting the day to day shopping needs of local communities, particularly in rural communities, large residential estates and outside main shopping areas generally. It states “Alongside community social facilities, the F2 class includes what would be considered shops servicing the essential needs of local communities. This is defined as a shop mostly for the sale of a range of essential dry goods and food to visiting member of the public where there is no commercial class retail unit within 1,000 metres and the shop area is no larger than 280sq m . This provides some protection for such shops, while placing those shops found on high streets and town centres in the new ‘commercial’ class.”

Policy Approach

- 9.293 It is considered that the policy should be updated to clarify that the shops are for the sale of essential goods including food, in line with the Class F2 Community Use Local Shop definition.
- 9.294 The proposed approach is as follows:

HVC/LS: Dispersed Local Shops	Option	Advantages	Disadvantages
A	Retain policy protecting dispersed local shops with amendment to clarify that the local shops are for the sale of essential goods including food (use class F2).	This recognises the importance of small, local shops in meeting the day to day shopping needs of local communities, particularly in rural communities, large residential estates and outside main shopping areas. Protecting existing and making provision for new local shops also facilitates walking and cycling, minimising the reliance on, and discouraging unnecessary use of, private cars, especially for local trips	None identified.

Question: Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Policy HVC/H: Health and Wellbeing

Healthy places

- 9.295 The National Planning Policy Framework (NPPF) states that planning policy should promote health and wellbeing. NPPF Paragraph 96 outlines that this should be achieved through promoting social interaction, making spaces safe and accessible, and creating places that enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs.
- 9.296 The B&NES Joint Health and Wellbeing Strategy sets out the ambition that the local plan is utilised to deliver health places and reduce inequalities, and therefore it is appropriate to develop a specific health and wellbeing policy.
- 9.297 Therefore, it is proposed to include a policy in the Local Plan that requires new development to contribute towards creating healthy places. This will be demonstrated through completion of a health impact assessment to be submitted as part of a planning application. Further evidence can be found in the [topic paper](#).

HVC/H: Healthy Places	Option	Advantages	Disadvantages
A	<p>All development must contribute toward creating healthy places, including encouraging active travel, creating inclusive and accessible public realm, and supplying access to green space. This will be assessed through health impact assessments, required as part of an application for any major development, or development with an anticipated major impact, including cumulatively.</p>	<p>Including HIA requirements within the policy makes it easier to assess.</p>	<p>Becomes a very lengthy policy. Focus on the health impact assessment element of the policy may lead to reduced emphasis on the components of a healthy place.</p>
B	<p>All development must contribute toward creating healthy places, and the policy will outline the ways in which this should be done.</p> <p>Details on health impact assessments are left out, and instead included in a separate policy (see below).</p>	<p>Gives more weight to the components of healthy places and acts as a statement of intent for our approach to health in planning.</p>	<p>No metrics - may make it harder to assess in determining the planning application.</p>

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Health Impact Assessments

9.298 Health Impact Assessment (HIA) is a practical tool which is used to assess the potential health impacts of a policy, programme or project on a population. The Planning Practice Guidance identifies HIAs as a useful tool where a development is expected to have a significant impact. HIAs should be completed and submitted by the applicant as part of a planning application for major development.

HVC/H: Health Impact Assessments	Option	Advantages	Disadvantages
A	<p>Health Impact Assessments will be required on any major development, or development likely to have a major impact, including through cumulative impact.</p> <p>The definition of a 'major development' will be outlined within the policy.</p>	Triggers are clearly laid out, makes the policy easy to implement.	None identified.
B	No separate policy. Health impact assessments instead included within the overarching healthy places policy.	Provides context to policy and makes the Healthy Places policy easier to implement.	Makes a very long policy, which may lead to details on HIAs being excluded.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

Hot Food Takeaways

- 9.299 The national health policy context now sets a clear ambition for taking decisive action for healthy weight. The Planning Practice Guidance for Health and Wellbeing supports the use of planning by local authorities to limit hot food takeaways in Paragraph 004, especially through exclusion zones.
- 9.300 The [evidence paper](#) highlights how national and local evidence supports using the Local Plan to restrict hot food takeaways on the basis of proximity to schools and to prevent high concentrations and clustering of hot food takeaways.
- 9.301 Therefore, in line with the B&NES Joint Health and Wellbeing strategy, it is appropriate to use the local plan to reduce health inequalities.

HVC/H: Hot Food Takeaways	Option	Advantages	Disadvantages
A	<p>Policy restricting hot food takeaways based on their proximity to schools and other places where children gather, as well as the local density of existing hot food takeaways.</p> <p>Proposed hot food takeaway use will not be allowed with 400m of a school, within 400m of at least 2 existing hot food takeaway uses, if it would cause more than 2 hot food takeaways to be adjacent to each other, or if it would lead to more than 10% of units in a local centre to be in hot food takeaway use.</p>	Clear parameters would make the policy easier to enforce. Aligned with the PPG.	Likely to be appealed/lobbied against by industry.
B	Similar policy, but proposed hot food takeaways within 400m of a school will be allowed if situated within a designated local centre.	Recognises the function of local centres and the role hot food takeaways can play in increasing footfall, slightly less restrictive so potentially less controversial.	The option may be appealed/lobbied against by industry. The option does not reduce exposure to hot food takeaways on school journeys for children and young people attending schools within designated local centres.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

HVC/CF: Community Facilities

9.302 Policy RA3 was adopted through the Core Strategy in 2014 and policy LCR2 was adopted through the Placemaking Plan in 2017. Both policies seek to encourage the development of new community facilities. Policy RA3 allows for the provision of new community facilities within or adjoining villages. Policy LCR2 allows for new facilities outside of the scope of RA3. The policy also allows for new facilities where there is inadequate provision. Both policies are fit for purpose and could be retained. However, there is an option to consolidate the wording into one policy. The aims of the policies would remain the same and perform the same function.

9.303 The policy wording can also be expanded to acknowledge the importance of cultural facilities as community assets. As with community facilities, cultural facilities should be protected and new development should be supported.

HVC/CF Community Facilities	Options	Advantages	Disadvantages
A	<p>Combine the wording of policies RA3 and LCR2 to result in a single policy regarding new community facilities. The policy would continue to encourage the provision of new facilities within or related to settlements and to meet any shortfalls arising from new development.</p> <p>Expand the policy wording to take account of cultural and social facilities being a valued community facility.</p>	<p>A policy that is easier to understand and applied to all community facilities across the district.</p>	<p>The policy would not be place specific.</p>

Do you support this policy approach? Please say why, and add any extra comments about this policy that you would like to make.

HVC/PS: Safeguarding Land for Primary School Use

9.304 Policy LCR3 includes a list of land which is safeguarded for the expansion of primary schools as follows;

School	Land Size
Oldfield Park Junior School, Claude Avenue	0.21ha
St Saviours Primary School	0.1ha
St Keyna Primary School	0.65ha
Welton Primary School	1.1ha
Land at Silver Street, Norton Hill, Midsomer Norton	4.7ha
St Mary's Primary, Writhlington	1.0ha
Camerton Primary School	0.6ha
Clutton Primary School	0.6ha
East Harptree Primary School	0.25ha
Freshford Primary School	0.3ha
Marksbury Primary School	0.8ha
Shoscombe Primary School	0.4ha

9.305 Three of the sites on the list above. Land at Silver Street and Camerton Primary School can now be removed as the sites have been developed. Land at St Keyna Primary School has been added to the school site to facilitate enlargement and can also be removed from the list.

9.306 The list can be further reviewed if through the consultation it is demonstrated that further sites are no longer required for educational purposes.

9.307 The allocation of new housing sites in the draft Local Plan may result in additional sites being added to the list of safeguarded land.

HVC/PS: Safeguarding Land for Primary School Use	Option
A	Remove Land at Silver Street, Camerton Primary School and St Keyna Primary School from the list of safeguarded land.

Do you support this policy approach? Please say why, and add any extra comments about this policy that you would like to make.

HVC/PSC Primary School Capacity

- 9.308 The current policy seeks to only allow development where there is a primary school within a reasonable distance and that has capacity to accommodate new or additional children that will be generated by the proposed development. The policy seeks to ensure that travel to primary schools is not undertaken by car and does not extend outside the local area. However, the current policy does not take into account early years education and childcare provision and secondary school provision.
- 9.309 The evidence shows that there is a shortfall of early years education and childcare provision in some areas and therefore it is important to ensure that new development does not put unacceptable pressure on existing services and can provide for the additional population.
- 9.310 As stated in the Planning Obligations SPD CIL forms the main mechanism for funding further development relating to school places. However, Section 106 is utilised to fund more strategic needs for schools as larger developments will have a greater impact on school capacity.
- 9.311 Option A proposes to retain the existing policy to ensure that any new development does not put pressure on existing primary schools that cannot be appropriately accommodated and therefore, that residents in settlements can access their local school.
- 9.312 Option B proposes to widen the scope of the existing policy by including early years education and childcare provision and secondary school places. This would ensure that occupiers of new development can access their local school and recognises that the need exists for all ages of children generated by development being able to access education locally. School places must be accessible via a sustainable means of transport.

HVC/PSC Primary School Capacity	Options	Advantages	Disadvantages
A	Retain the existing policy	The policy has been proven to ensure that development is only acceptable where there is access to primary school places for children generated by the proposed development.	The policy only relates to primary schools and does not take account of early years education and childcare provision or secondary school provision.
B	Update the policy to include secondary school provision and early years education and childcare provision. The proposed policy would require that where residential development is permitted there is early years education and childcare, primary school and secondary school places within a reasonable distance. Sufficient spare capacity must exist or additional capacity be created with the expansion of schools.	The proposed changes will take account of all areas or levels of education. There is a known deficit of early years education and childcare places and the cumulative impact of development including on allocated sites could also put pressure on secondary school places.	The policy could restrict the location of development and result in viability problems.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

HVC/C Safeguarding Land for Cemeteries

9.313 The Council owns and manages Haycombe Cemetery, on the edge of Bath, and Harptree Cemetery and is responsible for the maintenance for 30 closed cemeteries. Others are owned and managed by the Town and Parish Councils or Parochial Church Councils. Land has been safeguarded in the previous Local Plan for the extensions to cemeteries identified to ensure future needs are met at Haycombe Cemetery and the cemetery at Eckweek Lane which is managed by the parish council. The land that was safeguarded in Haycombe is now in use.

9.314 Haycombe and the Durley Hill cemeteries are both in the Green Belt. The NPPF confirms that provision for cemeteries in the Green Belt is not inappropriate development providing it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.



Figure 63 Area that could be safeguarded for cemetery use

9.315 The council has identified land to the west of Haycombe cemetery to be used to expand Haycombe cemetery. The Policies Map can be amended to include this land as safeguarded land for cemetery use. The area of land is outlined on the diagram below.

9.316 The land identified to be safeguarded will need to take account of the existing landscape sensitivities of the area and care would need to be taken to preserve the landscape character. Haycombe is located within the World Heritage Site and any further expansion of the cemetery would need to take account of the impact the World Heritage Site and its setting. The policy requirement should ensure that development is in a form which minimises and mitigate impact on the landscape setting.

HVC/C Safeguarding Land for Cemeteries	Options	Advantages	Disadvantages
A	Retain the existing policy and safeguard no further land	The openness of the green belt and setting of the World Heritage Site is retained.	If further burial capacity is needed then the land required will not have been safeguarded meaning the need may not potentially be met.
B	Through the council's bereavement services identify and assess if the identified land at Haycombe should be safeguarded for use as additional burial capacity.	Any expansion of cemeteries will be facilitated through safeguarding land thereby providing additional burial capacity for the district.	If land were to be allocated at Haycombe further expansion into the green belt may harm the openness of the green belt and the World Heritage Site and its setting, albeit such harm should be minimised and mitigated through the policy requirements.

Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options

HVC/A Protecting Allotments

- 9.317 Local food growing spaces are not only an important leisure resource, but they are recognised locally and nationally for their value as open spaces, especially in urban areas and for their contribution to sustainable development and health objectives including local food production, promoting physical activity, community cohesion, green infrastructure networks, biodiversity and their potential for education opportunities.
- 9.318 The council currently manages 24 allotments across Bath and elsewhere other allotments are managed by local bodies such as social housing organisations and parish councils.
- 9.319 Since policy LCR8 was adopted a new allotment site was permitted under reference 17/00329/FUL. These allotments at Combe Down were granted permission to replace allotments lost under reference 16/05548/MINW which resulted in the loss of allotment land to mineral extraction. The site sits within a minerals allocation area.
- 9.320 A new allotment has also been provided by the council at Fairfield Valley between Fairfield Park Road and Fairfield Avenue.
- 9.321 Policy LCR8 is a strong policy which affords protection to statutory, temporary, and private allotments. The new land at Combe Down allotments and the new site at Fairfield Valley are statutory allotments run by the council and therefore the Policies Map should be amended to include these sites as set out in the maps below.



Figure 64: Proposed policies map amendment



Figure 65: Proposed policies map amendment

9.322 During the course of the Local Plan period new sites for housing will be allocated which will likely result in requirements for additional allotment land. The Planning Obligations SPD sets out the requirements for allotment land. Under the adopted policy any new allotments provided in the plan period would be afforded the same protection as the allotments on the proposals map.

HVC/A Protecting Allotments	Options	Advantages	Disadvantages
A	Amend the proposals map to include the new allotment land permitted under application reference 17/00329/FUL and the new allotment site at Fairfield Valley	Recently permitted allotment land will be afforded the same protection as existing allotments.	

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

HVC/B: Broadband

9.323 Building Regulations Part R requires new residential properties to be connected to broadband. The requirements of LCR7B are now required under building regulations. Therefore, this policy is no longer needed and is proposed to be deleted.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

HVC/LGS: Local Green Spaces

Background

9.324 Local Green Spaces that are of demonstrable importance to local communities can be designated and protected from development. The National Planning Policy Framework (NPPF) Section 8 provides guidance for local green space designation. Relevant paragraphs concerning Local Green Space Designation are as follows:

105. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

106. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

107. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

9.325 National Policy makes clear that blanket designation of all green space is not appropriate. Proposed designations must be supported by evidence that the green area is special to the local community. There are several specific exceptions, where designating a local green space would not be appropriate:

- Education sites – The NPPF places great weight (para 99 (a)) on the need for Schools and Colleges to expand/alter. Because of this, local green space designations within school ground including playing fields are very unlikely to be suitable for designation.
- Highway Land/Verges - Land adjoining the highway is subject to permitted development rights and may need to be utilised or reconfigured for highway works and is therefore not suitable for designation.

9.326 Planning Practice Guidance (PPG) cites examples of what green areas can be identified as Local Green Space - For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

9.327 Sites with planning permission – A green space within a site with extant planning permission (within the red line) cannot be designated until the development is complete.

9.328 Land cannot be excluded because there is an existing planning designation, although national guidance recommends that the bar is higher for land within the Green Belt/ Area of Outstanding Natural Beauty (AONB) or with another national designation i.e. the added value of the designation needs to be clearly demonstrated over and above the existing designation. On this basis it is very unlikely that land within the Green Belt/AONB or within a nationally designated Historic Park & Garden would be suitable for designation.

9.329 Bath and North East Somerset Placemaking Plan (PMP) reflects national guidance through policy LCR6A: Local Green Spaces:

1. Development that would conflict with the reasons that the local green space has been demonstrated to be special to the local community and holds a particular local significance; and prejudice its role as Local Green Space will not be permitted unless very special circumstances are demonstrated.

2. Local Green Spaces are defined on the Policies Map and additional areas may also be designated as Local Green Space in Neighbourhood Plans.

Consultation/ Methodology

- 9.330 In preparing the new Local Plan Options document we have sought new sites for nomination as local green spaces. Land which has previously been assessed as part of the Placemaking Plan (PMP) is not proposed to be reassessed as part of the new local plan.
- 9.331 For example, land that is already designated as local green space will continue to hold such a designation. Land previously nominated and not designated will also not be reassessed. The reason being sites previously put forward were assessed by both the Council and a Planning Inspector as part of the PMP examination, and under a policy framework and guidance which is the same as that used for this current consultation. Therefore, it was requested that only new land not previously put forward be nominated now for designation.
- 9.332 As the local green space designation is linked to community value, which must be demonstrated, it was decided that community nominations would be sought. This was facilitated by means of a proforma and guidance to communities.
- 9.333 Each of the sites nominated for designation was then assessed against the three NPPF criteria outlined above, and the other exceptions were considered.
- 9.334 Where landowners are not a ward councillor/parish council/community organisation nominating the site as a Local Green Space, B&NES Council contacted landowners to notify them that their land has been nominated and to ask for their comments.

Proposed Approach

- 9.335 The policy provides safeguarding against the loss of local green spaces which hold community value. The current policy accords with national policy and is fit for purpose. It is therefore proposed to retain the existing policy and to potentially designate additional local green spaces.
- 9.336 In total 72 sites have been nominated. Of the sites 34 are situated within the city of Bath, the remaining 38 set across the wider district.
- 9.337 Of these 72 nominations one nomination had been withdrawn, and two are already designated as local green spaces. The remaining 69 sites have been assessed in line with the above policy and methodology.
- 9.338 In line with the consultation and assessment the 26 sites proposed for new Local Green Space designation are outlined within Appendix 4. The full list of sites nominated sites with completed pro-formas, and assessments can be accessed via the associated Local Green Spaces Topic Paper.

Question: Are the proposed new Local Green Spaces identified in Appendix 4 effective/ justified?

Question: Are there any green spaces not already nominated for Local Green Space designation which should be?

Heritage and Design

Policy HD/EQ: Environmental Quality

Background

9.339 The NPPF sets out the approach to design under Section 12 ‘Achieving well-designed places’. Paragraph 131 is of key consideration and notes the following:

9.340 *‘The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.’*

9.341 Design policies are a key consideration in addressing the Local Plan’s spatial priorities. The spatial priorities for the Local Plan that are particularly relevant include:

- Attractive, Healthy and Sustainable Places;
- Improved Connectivity for All and Reduced Need to Travel;
- Conserving and Enhancing Heritage Assets; and
- Improve Physical and Mental Health and Wellbeing for all.

9.342 All policies will need to be updated to reflect the national policy context, particularly the National Design Guide and the requirement for Design Codes (see section on Design Codes from para 9.422 below).

9.343 The West of England Combined Authority (the CA) and the region’s local authorities are committed to bringing forward clean, inclusive growth and creating healthy, happy places. The CA and the four West of England Unitary Authorities worked together through 2020 to develop a Placemaking Charter in dialogue with stakeholders. The Charter sets out a shared ambition for the quality of development in the West of England and communicate the authorities’ priorities and expectations to support clean, inclusive growth, responding to the climate and ecological emergencies.

9.344 At a local level design review, policy support, consultation and training for the South West is provided by Design West. Design West brings together expertise from across the built and natural environment sectors. The service is independent and not-for-profit working collaboratively with the development sector and decision-makers to shape better places.

9.345 Adopted Policy CP6 is an overarching design policy. The policy seeks to ensure Bath & North East Somerset's environmental quality is fostered both for existing and future generations.

9.346 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.347 The policy remains broadly fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/ links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Strategy and priorities and WECA Placemaking Charter. Existing references to 'Building for Life 12' will be updated to its next iteration 'Building for a Healthy Life'.

HD/EQ: Environmental Quality	Option	Advantages	Disadvantages
A	Retain policy CP6 with amendments as set out above.	Adopted policy presents no issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/WHSS: World Heritage Site and its Setting

Background

9.348 The National Planning Policy Framework (NPPF) Section 16 – Conserving and Enhancing the Historic Environment sets out under paragraph 196 the following:

‘Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place.’

9.349 Policy B4 seeks to prevent harm to the Outstanding Universal Value of the City of Bath World Heritage Site and its setting and is a material consideration when making planning decisions.

9.350 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.351 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments will be incorporated to reference the second UNESCO World Heritage Site inscription as one of the 11 Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing. Inscribed on the World Heritage List on the 24th July 2021.

9.352 The new inscription will need to be referenced and linked with policy PCS8: Bath Hot Springs.

9.353 In addition reference will be required to making use of the management plan(s) and the WHS Setting SPD when considering development within the site or its setting and when carrying out Heritage Impact Assessments (HIAs).

HD/WHSS: World Heritage Site and its Setting	Option	Advantages	Disadvantages
A	Retain policy B4 with amendments.	Adopted policy presents no significant issues or concerns arising from the determination of planning applications. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/HE: Historic Environment

Background

- 9.354 The NPPF Section 16 – Conserving and Enhancing the Historic Environment (para 196) sets out the context for local policy as outlined in the section of this document above.
- 9.355 The NPPF further highlights key considerations regarding proposals affecting heritage assets (Paragraphs 200-204), and consideration to potential impacts (Paragraphs 205-214).
- 9.356 Policy HE1 aims to manage the historic environment in the most efficient and effective way, and to sustain its overall value to society. The policy also seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting in the development process.
- 9.357 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

- 9.358 The policy remains fit for purpose. Policy HE1 is, in the main, a robust policy. Consultation with Historic England indicates the policy is reasonable, appropriate and consistent with national policy. However, adjustments are suggested to improve its clarity, consistency with national policy and guidance, and effectiveness. Specific changes are proposed as follows:

- Adding a reference to the World Heritage Site setting, and ensuring consistency when referencing the World Heritage Site;
- Reference required for Locally Listed Heritage Assets;
- Consideration regarding the evolving nature of energy efficiency in listed buildings or on Heritage Assets (Heritage assets are wide ranging and include designated and undesignated buildings), and how to facilitate energy efficiency within these buildings; and
- Consideration to the natural environment veteran and ancient trees/ woodlands.

HD/HE: Historic Environment	Option	Advantages	Disadvantages
A	Retain policy HE1 with amendments as outlined above.	Adopted policy is well used by Development Management Officers. Amendments outlined above will improve its clarity, consistency with national policy and guidance, and effectiveness.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Background

9.359 The Somersetshire Coal Canal and the Wansdyke earthwork are two important linear historic assets in Bath and North East Somerset.

9.360 The Wansdyke is a nationally important heritage asset and is one of the most significant historical features within the area and is a Scheduled Monument. This is defined as a Designated Heritage Asset within the National Planning Policy Framework (NPPF). The Somersetshire Coal Canal is also a Designated Heritage Asset.

9.361 The NPPF Section 16 – Conserving and Enhancing the Historic Environment paragraph 196 sets out the context for local policy.

9.362 The NPPF sets out the approach to considering impacts to designated heritage assets under paragraph 205 notes the following:

‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

9.363 Paragraph 206 further notes the following:

‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’*

9.364 These historic assets benefit from the provisions of Core Strategy Policy CP6 and Policy HE1. However, the importance of these linear routes is highlighted in a separate policy and are defined on the Policies Map with a buffer to catch the widest point of the assets.

9.365 Policy HE2 seeks to ensure there is appropriate mitigation and/or enhancement (consistent with Policy HE1) for any development adversely affecting the physical remains and/or historic routes of the Wansdyke or Somersetshire Coal Canal, as defined on the Policies Map, and/or their setting.

9.366 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.367 The policy remains fit for purpose. However, the policy could be reworded to also encourage development or improvements which would sustain/enhance or better reveal the significance of the Wansdyke and/or Somersetshire Coal Canal. Amendments sought would also seek further consistency with national policy and guidance, and effectiveness.

HD/SCCW: Somersetshire Coal Canal and the Wansdyke	Option	Advantages	Disadvantages
A	Retain policy HE2 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from Development Management Officers in its implementation. Amendments sought would also provide further consistency with national policy and guidance, and effectiveness.	None identified.

- 9.368 The boundary of the Somersetshire Coal Canal and the Wansdyke is displayed on the policies map. Development that would harm the assets within the defined boundary for Policy HE2 area is restricted through the policy. However, consultation with the Somersetshire Coal Society has indicated some developments have taken place which will present significant challenges to the successful restoration of the Somersetshire Coal Canal to navigation.
- 9.369 The Somersetshire Coal Society's current focus is the conservation of the Combe Hay Lock Flight and the restoration of the canal profile and stonework structures leading to the Paulton / Timsbury terminus with the objective of restoring the western terminus of the canal to water.
- 9.370 Several locations already protected from development (as defined by policy HE2 on the Policies Map) have been highlighted as having potential for expansion. The expansions are required to allow for diversions from the historic route where the original canal line has been blocked by recent developments.
- 9.371 This approach seeks to offer a solution which allows the canal to be restored to navigation while minimising the impact of that restoration on landowners/homeowners. The expansions indicated below are proposed to be shown on the Policies Map accompanying the Draft Local Plan and are situated at the following locations (expansions highlighted in red with the existing route shown in blue):

Radford

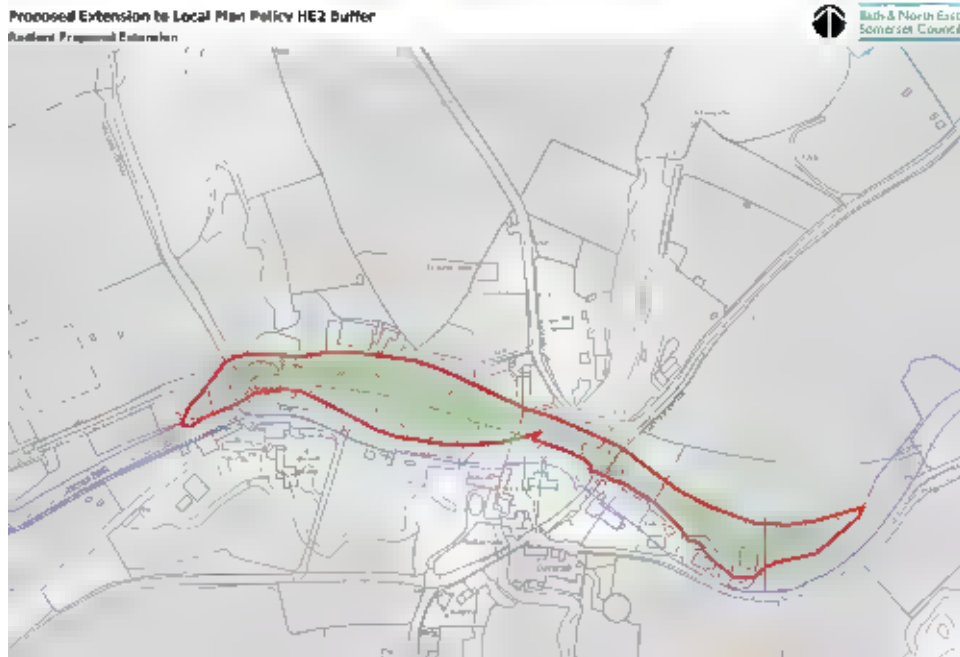


Figure 66: Proposed amendment to the Policies Map - Radford

Camerton

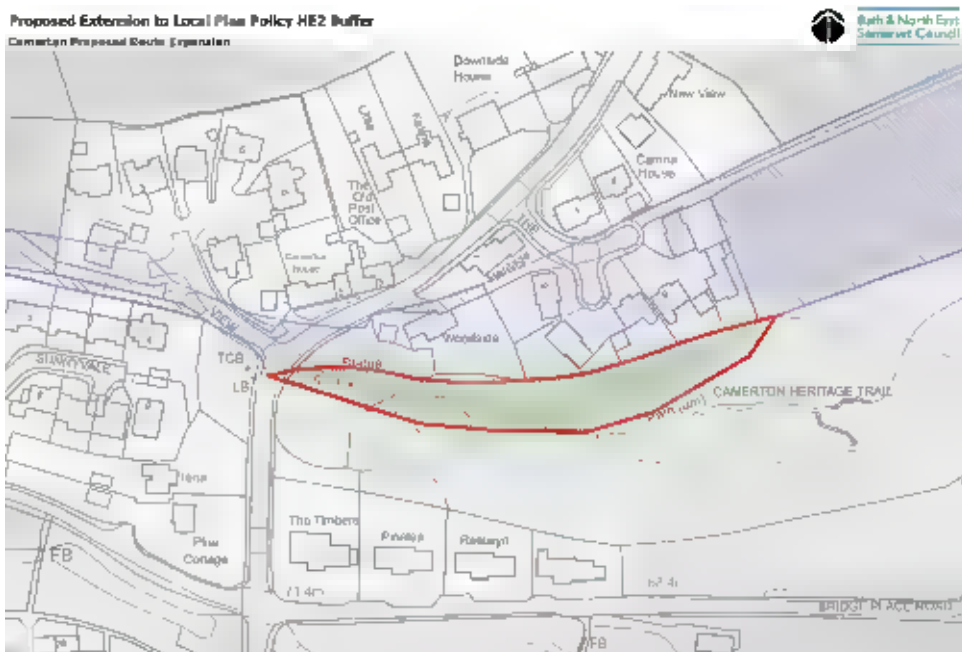


Figure 67: Proposed amendment to the Policies Map - Camerton

Camerton - New Pit

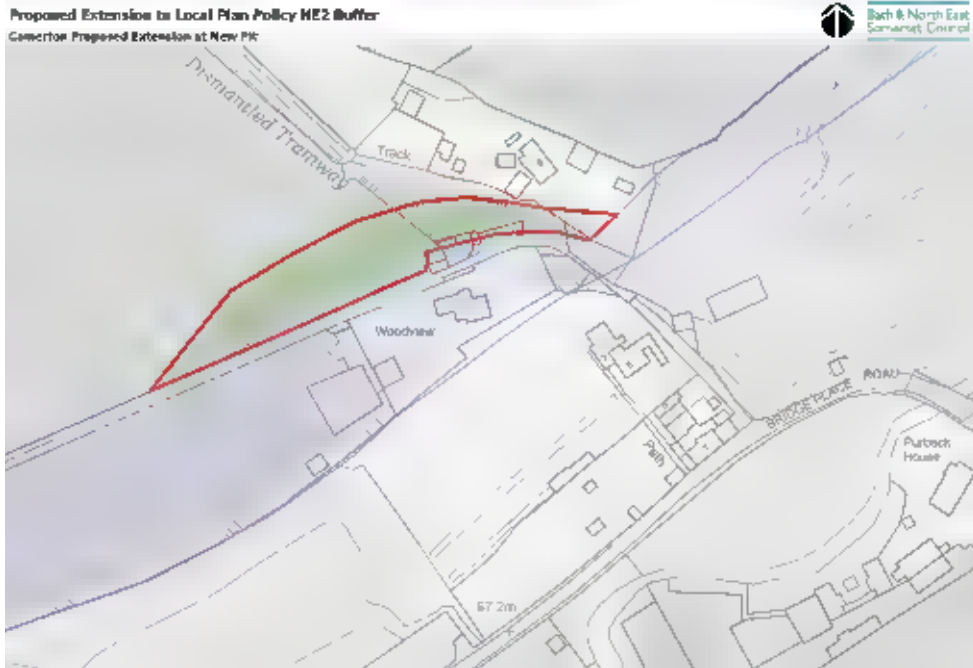


Figure 68: Proposed amendment to the Policies Map - Camerton New Pit

Dunkerton

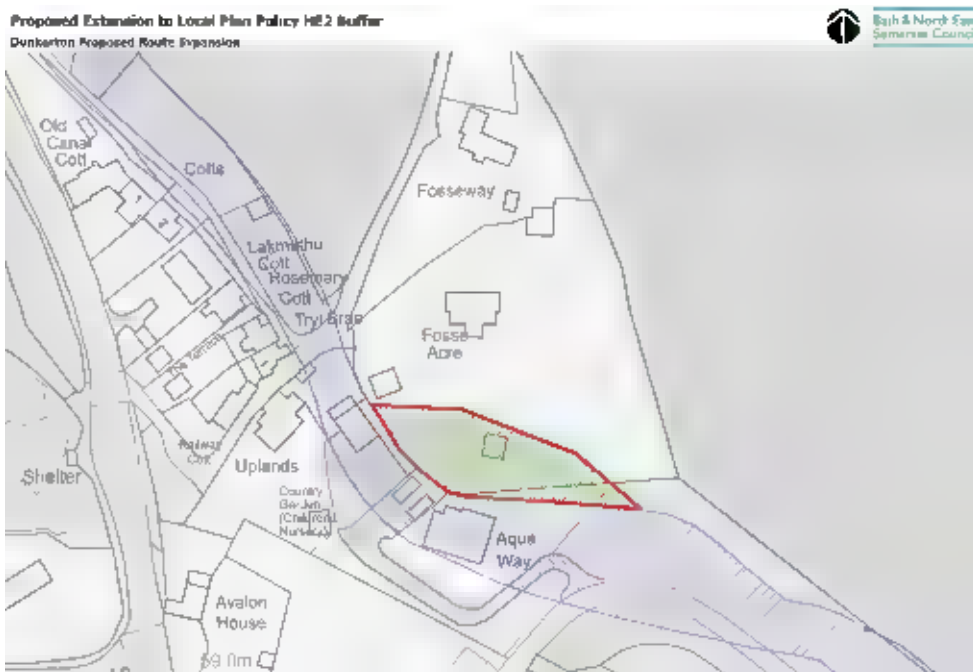


Figure 69: Proposed amendment to the Policies Map - Dunkerton

Combe Hay Cemetery

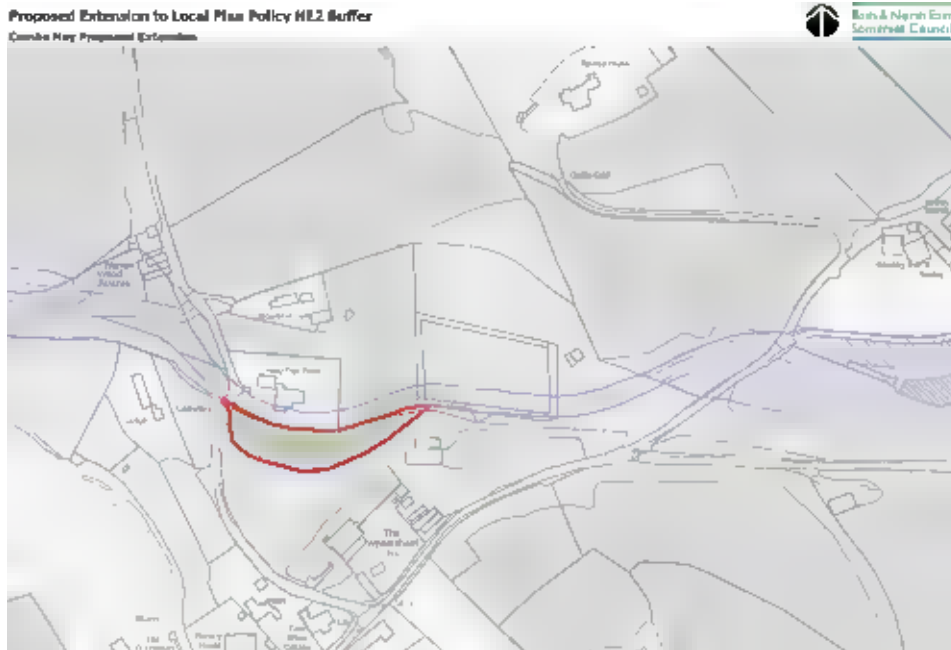


Figure 70: Proposed amendment to the Policies Map - Combe Hay Cemetery

Should we re-word Policy HE2 to also encourage development or improvements which would sustain or enhance, or better reveal, the significance of the Wansdyke or Somersetshire Coal Canal?

Do you agree with our proposed expansions to the Somersetshire Coal Canal route? Are the proposals indicated in the maps (Figures 66 to 70) effective and justified, in your opinion? Please give reasons for your answers.

Policy HD/GUDP: General Urban Design Principles

Background

9.372 The delivery of well-designed places is a key consideration set out within the NPPF. Section 2 - Achieving sustainable development notes the planning system has three overarching objectives, paragraph 8 b) which sets out the 'Social objective' notes the following:

'To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.'

9.373 The NPPF further sets out the approach to design under Section 12. Achieving well-designed places. Paragraph 131 is of key consideration and notes the following:

'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'

9.374 Paragraph 132 is also of consideration and sets out the following:

'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so, they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.'

9.375 The West of England Combined Authority and the four West of England Unitary Authorities worked together through 2020 to develop a Placemaking Charter in dialogue with stakeholders. The Charter sets out a shared ambition for the quality of development in the West of England and communicate the authorities' priorities and expectations to support clean, inclusive growth, responding to the climate and ecological emergencies.

9.376 At a local level design review, policy support, consultation and training for the South West is provided by Design West. Design West brings together expertise from across the built and natural environment sectors. The service is independent and not-for-profit working collaboratively with the development sector and decision-makers to shape better places.

9.377 Policy D1 sets out the general urban design principles that will be applied at a high level. These are particularly relevant for large development sites or Masterplans but apply equally to all development scales.

9.378 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.379 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design.

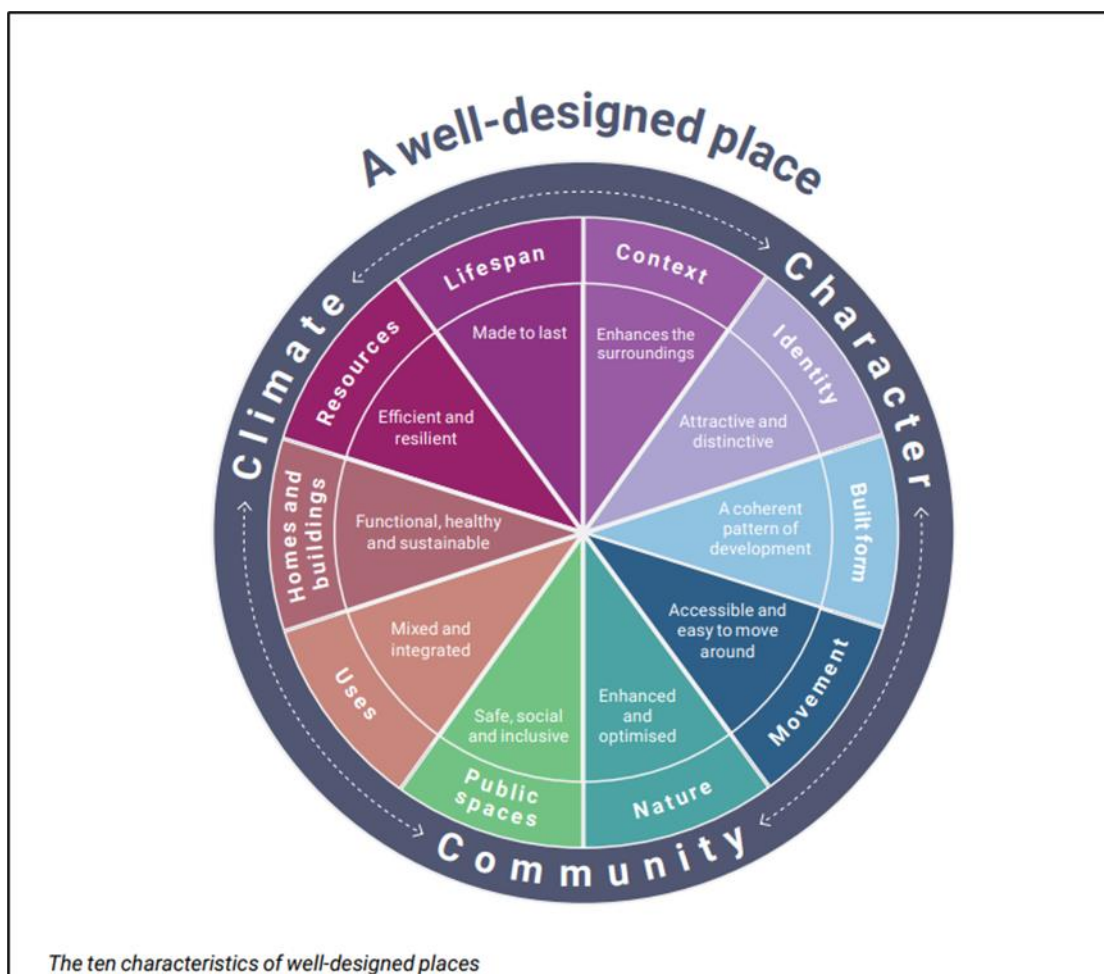


Figure 71: Source - National Design Guide 2021

9.380 Going forward as part of the new local plan the policy approach will be updated and amended to better reflect the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

HD/GUDP: General Urban Design Principles	Option	Advantages	Disadvantages
A	Retain policy D1 with updates and amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/LCD: Local Character and Distinctiveness

Background

9.381 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development notes the planning system has three overarching objectives which set the overarching context for local policy.

9.382 The NPPF further sets out the approach to design under Section 12. Achieving well-designed places. Paragraph 126 is of key consideration and notes the following:

‘The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.’

9.383 Placemaking Plan Policy D2 sets out the policy on local character and distinctiveness, and designs should respond to an analysis of the place in a positive way. Evidence of locally specific analysis which underpins the design rationale will be sought to demonstrate that this policy has been met. Existing local character appraisals, site briefs, and other evidence should be considered when establishing the local character and distinctiveness.

9.384 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.385 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government’s priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

9.386 The policy presents links/ crossovers to policies NE2 and NE2A (covered in greater detail within the Nature and Ecosystems Topic Paper). Any changes or amendments to this policy will need to reference the links/ crossovers.

HD/LCD: Local Character and Distinctiveness	Option	Advantages	Disadvantages
A	Retain policy D2 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/UF: Urban Fabric

Background

- 9.387 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives which set the overarching context for local policy. As outlined in the section above the NPPF further sets out the approach to design under Section 12 - Achieving well-designed places (see in particular para 126).
- 9.388 Placemaking Plan Policy D3 relates to the way in which development needs to weave together and connect urban fabric, to ensure that places are well connected, safe, inclusive and walkable.
- 9.389 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

- 9.390 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

HD/UF: Urban Fabric	Option	Advantages	Disadvantages
A	Retain policy D3 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/SS: Streets and Spaces

Background

- 9.391 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives which set the overarching context for local policy. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places. Paragraph 126 as outlined above is of key consideration.
- 9.392 Placemaking Plan Policy D4 seeks to reinforce the importance of development making appropriate connections and relates specifically to streets, highways design and public realm.
- 9.393 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

- 9.394 The policy remains broadly fit for purpose and accords with national and local strategies, however, amendments could be incorporated.
- 9.395 Going forward the policy could be amended to better strengthen the requirement for street trees. The current policy requires for street trees and green spaces to contribute to a network of Green Infrastructure and should be adequately sited to promote connectivity for people and wildlife. Trees are also important in respect of street design and quality. Streets need to be appropriately designed with sufficient space to accommodate trees without being too close to buildings and to accommodate walkers including for example wheelchairs and buggies, street furniture and underground services. This should be made clearer in Policy D4.
- 9.396 The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/ links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

HD/SS: Streets and Spaces	Option	Advantages	Disadvantages
A	Retain policy D4 with amendments outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/BD: Building Design

Background

- 9.397 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives, paragraph 8 b) sets out the context for local policy as outlined above. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places. Paragraph 126 as outlined above is of key consideration.
- 9.398 Placemaking Plan Policy D5 relates specifically to building-scale, design and materials. Reference is also made to the need to design-out nesting and roosting area for seagulls which can pose public health and safety problems.
- 9.399 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

- 9.400 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated.

9.401 The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government’s priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and the WECA Placemaking Charter.

9.402 Opportunities will also be sought to strengthen the requirement of the inclusion of habitat features (e.g. nesting birds within buildings and connectivity measures for hedgehogs), aligning with the options and approaches as set out under the nature and ecosystem services section.

HD/BD: Building Design	Option	Advantages	Disadvantages
A	Retain policy D5 with amendments outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/A: Amenity

Background

- 9.403 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives, paragraph 8 b) sets the overarching context for local policy. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places. Paragraph 126 as outlined above is of key consideration.
- 9.404 Placemaking Plan Policy D6 covers the issue of amenity, ensuring that developments provide the appropriate level of amenities for new and future occupiers, relative to their use and avoiding harm to private amenity in terms of privacy, light and outlook/overlooking.
- 9.405 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

- 9.406 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design.
- 9.407 Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.
- 9.408 There are also opportunities to better align with the NPPF in particular the 'Agent of Change' requirement whereby existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established as outlined by paragraph 192.

HD/A: Amenity	Option	Advantages	Disadvantages
A	Retain policy D6 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/IBD: Infill & Backland Development

Background

- 9.409 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development notes the planning system has three overarching objectives, paragraph 8 b) sets the overarching context for local policy as outlined above. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places, paragraph 126 also as outlined above is of key consideration.
- 9.410 Placemaking Plan Policy D7 relates specifically to infill and backland development, it applies to all parts of the district both urban and rural and emphasises the importance of an approach based on a sound understanding of character and context.
- 9.411 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

- 9.412 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement.

HD/IBD: Infill & Backland Development	Option	Advantages	Disadvantages
A	Retain policy D7 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation, but the proposed change would aid implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/L: Lighting

Background

9.413 The NPPF makes it clear that planning policies should limit the impact of light pollution from artificial light. Section 15 – Conserving and enhancing the natural environment sets out amongst other things the following:

‘Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.’

9.414 National Planning Policy Guidance (NPPG) includes further guidance on the factors that are relevant in considering the implications of light pollution, including ecological impact.

9.415 Placemaking Plan Policy D8 sets out the general principles that apply to all proposals for artificial lighting.

9.416 Within Bath and other urban areas, a high level of lighting exists and is generally accepted whilst recognising even within the urban area, important dark corridors and dark spaces do exist and these are used by, if not essential for, wildlife. The floodlighting of many historic buildings enhances the night time scene. However, badly designed lighting schemes can be just as damaging to private and public amenity as in darker rural areas. New light sources can have a disproportionate impact because of the area’s topography.

9.417 Within the district’s open countryside external lighting is generally not acceptable. Lighting can be extremely prominent and, in many cases, visible over a large area and can often introduce an urban appearance to the countryside which for the most part is not lit at night.

9.418 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.419 The policy remains fit for purpose. The current policy accords with national and local strategies, however, some amendments should be incorporated.

9.420 The approach sought within the new local plan will be to update policy D8 to address requirements for all new external and public space lighting to have minimal blue light content, and to specify a general requirement for a colour temperature requirement in ecologically sensitive areas, and within protected landscapes.

HD/L: Lighting	Option	Advantages	Disadvantages
A	Retain policy D8 with amendments.	<p>Adopted policy presents no issues or concerns arising from development management officers in its implementation.</p> <p>Controlling light pollution will provide benefits to the environment and greenhouse gas emissions. It will also present opportunities to reduce harm to humans' health and wellbeing and wildlife benefiting nature recovery.</p>	None identified.

Policy D8 - Do you think it is appropriate to retain this policy, with slight amendments, to address requirements for all new external and public space lighting to have minimal blue light content, and to specify a general requirement for a colour temperature requirement in ecologically sensitive areas, and within protected landscapes? Please give your reasons.

Question: Should we consider defining Environmental Zones for the district? Please give your reasons?

Question: Should B&NES and/or City of Bath consider applying for dark sky status?

Question: Could/should B&NES aspire to become blue light free within its care spaces?

Policy HD/AOSF: Advertisements & Outdoor Street Furniture

Background

9.421 The NPPF highlights planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

9.422 This is in addition to ensuring developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit. Developments should also optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.

9.423 The NPPF paragraph 136 further sets out the following:

'The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.'

9.424 Placemaking Plan Policy D9 aims to provide guidance that will be used in the determination of planning, advertisement and listed building consent in relation to advertisement and outdoor street furniture for commercial premises – including signage (both fascia and ancillary signage/advertising), outdoor tables and chairs, low level barriers etc. The policy seeks to ensure the delivery of good design, in line with NPPF.

9.425 The policy is in two parts: Advertisement policy, and Outdoor Street furniture policy. Additional detail is also provided for Bath Conservation Area in line with the stewardship principles WHS Management Plan (2014, or successor document).

9.426 It is noted that the Regeneration and Levelling Up Act 2023 (Schedule 22 - Pavement Licences) has confirmed the government's intention to progress with pavement licencing regime (via licencing) with no further requirement for a tables and chairs on the highway (via planning consent), as such this element of the policy will become redundant.

9.427 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.428 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement. Elements of the policy concerning tables and chairs on the highway will also be removed to reflect the Regeneration and Levelling Up Act 2023 (Schedule 22) as they will become redundant.

HD/AOSF: Advertisements & Outdoor Street Furniture	Option	Advantages	Disadvantages
A	Retain policy D9 with amendments to take account of Regeneration and Levelling Up Act 2023 (Schedule 22).	Adopted policy presents no issues or concerns arising from development management officers in its implementation.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/PR: Public Realm

Background

9.429 The NPPF highlights planning policies and decisions should ensure that developments, among other things, establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

9.430 The Public realm is defined as any publicly owned streets, pathways, right of ways, parks, publicly accessible open spaces and any public and civic building and facilities. Development proposals often include areas of public realm as part of their proposals and/or contribute financially to the creation to new or enhanced streets and spaces.

9.431 Several strategies and guidance to support the delivery and coordination of quality of public realm improvements and maintenance have been prepared. In addition, Neighbourhood Plans often include detailed public realm proposals and policies.

9.432 Placemaking Plan Policy D10 requires proposals to be designed to enhance the public realm and to contribute towards achieving public realm infrastructure improvements, in line with the Planning Obligations SPD, and successor documents.

9.433 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.434 The policy remains fit for purpose.

9.435 The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer.

9.436 This could include some headline principles from the pattern book and Public Realm and Movement Strategy being incorporated within the policy so that it is able to better define what good public realm is. This is with an aim of aiding planning balance and judgement.

HD/PR: Public Realm	Option	Advantages	Disadvantages
A	Retain policy D10 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy HD/DC: Design Codes

Background

9.437 The NPPF (para 133-134) sets out local authorities should seek to provide maximum clarity about design expectations at an early stage. These paragraphs note the following:

'para 133: ... Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.

Para 134: Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop.

Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.'

9.438 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper.

Policy Approach

9.439 Development of a policy with overarching design code principles. The design codes would be expected to include the following:

- Context - Local character and built heritage
- Movement - Design of the street network, active travel and public transport
- Nature - Design of green infrastructure, play spaces, SUDS and the protection of biodiversity
- Built Form - Density, built form and urban design
- Identity - character of buildings
- Public space - Design and of streets and public spaces
- Homes and Buildings - Type and tenure of homes
- Uses - Mix of uses and active frontage
- Resources - Environmental design, renewable energy provision and low energy networks

- Lifespan - Management and adoption standards

HD/DC: Design Codes	Option	Advantages	Disadvantages
A	Development of a policy with overarching design code principles as outlined above.	<p>Implementation of design codes will present a positive opportunity to engage with communities – particularly where there are large allocations.</p> <p>The approach will present wider master planning opportunities to support communities.</p> <p>Will present delivery requirements i.e., developments of greater significance owing to their scale, location, or impact on sensitive areas or important assets.</p>	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Sustainable Transport

- 9.440 The Sustainable Transport Policies were reviewed through the Local Plan Partial Update. The primary purpose of this was to better align policy with the Climate Emergency and strengthen the sustainability requirements for transport. The revised policies went through Examination, were found sound and adopted. The policies align with national policy and have been applied for more than 12 months since adoption, and are considered to be working well.
- 9.441 The review of these policies for the Local Plan considers whether they could be strengthened, clarified or updated, based on experience of applying the policies through Development Management, and Industry Best Practice.

Policy ST/HS

- 9.442 Policy ST1 ensures the delivery of well-connected places accessible by sustainable means of transport. It sets out the key principles which should be addressed when locating, planning, and designing development.
- 9.443 The policy was strengthened in the LPPU by explicitly recognising the importance of location and design in the transport sustainability of development. However, there is now an opportunity through the Local Plan to further strengthen the policy to enhance the potential to enable travelling by sustainable transport modes.

ST/HS: Promoting Sustainable Travel & Healthy Streets	Options	Advantages	Disadvantages
A	<p>Retain the fundamental elements of the Policy and make minor amendments to wording to update terminology, provide additional clarity and strengthen application.</p> <p>Amend the policy to require developments to enable, and where appropriate deliver travel by sustainable modes as opposed to encouraging, promoting and supporting sustainable travel options.</p> <p>Proposed to also remove wider policy references to the natural and built environment. These will instead be contained within specific policies relating to each of these matters.</p>	<p>Stronger, language will engender a more positive and proactive approach to sustainable travel which will provide genuine travel options and minimise travel distances therefore making a positive contribution to addressing the Climate Emergency.</p> <p>Reviewing wording to provide additional clarity will strengthen application in line with the purpose of the policy. Including references to the natural and built environment is unnecessary as it is covered by other relevant policies. Removing this provides clarity.</p>	<p>The amendments to policy are not considered to introduce negative implications. The Policy has been worded to ensure that it will be applied appropriately to the site context. This was tested through the LPPU Examination and has not materially changed.</p>

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy ST/AT

- 9.444 The council are currently progressing an Active Travel Masterplan which will set out a comprehensive plan for the existing and future active travel infrastructure required to enable and provide for sustainable forms of transport. This is being developed alongside the Local Plan 2022-2042.
- 9.445 The Local Plan is a critical tool in helping deliver the active travel infrastructure needed, not just for those developments contained in and facilitated by the plan but for the wider community. In order to ensure that those dedicated and protected routes identified in the Active Travel Masterplan are not compromised or prejudiced by development, existing and proposed active travel routes will be safeguarded through the Local Plan.
- 9.446 Policy ST2a seeks to make sure that any publicly accessible active travel routes are not adversely affected by development proposals and that opportunities to enhance the active travel route network are taken up. It also ensures that opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising identified routes, should be investigated, and implemented wherever feasible and necessary.
- 9.447 It is proposed to review the current safeguarded routes contained within ST2 and ST2a in order for the development plan to reflect current built infrastructure. Any revisions to the current safeguarded route will be shown on the Policies map accompanying the Draft (Reg 19) Local Plan. ST2a is proposed to be updated to include reference to the Active Travel Masterplan to ensure that future developments have regard for the plan.

ST/AT: Active Travel Routes	Options	Advantages	Disadvantages
A	Update the policy to have regard for the council's Active Travel Masterplan.	Ensures that development which adversely affects any identified active travel route within the plan provides appropriate mitigation.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy ST/RMD

- 9.448 Policy ST7 sets out the policy framework for considering the requirements and implications of development for the highway, transport systems and their users.
- 9.449 The updated policy seeks to make it explicit that developments must take a “Decide and Provide” approach to Transport Planning. A decide and provide approach offers the opportunity for more positive and integrated transport and land use planning by identifying a vision and providing the means to work towards achieving it. This offers the opportunity for positive transport planning and will help to implement the transport user hierarchy by prioritising walking, cycling and public transport first and foremost.
- 9.450 This is not a new approach for B&NES, as it has been established through ST1 in the LPPU. The purpose of including explicit requirement for a “Decide and Provide” approach in ST7 is to improve clarity by using the accepted Industry terminology, and to be clear that the requirements of ST1 are consistent with ST7 and are intended to be applied as such.

ST/RMD: Transport Requirements for Managing Development	Options	Advantages	Disadvantages
A	<p>Update the policy to emphasise the need for transport mitigation to be vision-led in line with a 'decide and provide' approach, and therefore deliver sustainable travel opportunities. This has been established in ST1, and the purpose is to strengthen ST7 in line with this.</p> <p>Proposed to remove wider policy references to the natural and built environment. These will instead be contained within specific policies relating to each of these matters.</p>	<p>Stronger, more positive approach to sustainable travel which will provide genuine travel outcomes therefore making a positive contribution to addressing the climate emergency.</p> <p>Greater clarity on consistency between ST1 and ST7.</p> <p>Including references to the natural and built environment is unnecessary as it is covered by other relevant policies. Removing this provides clarity.</p>	<p>More complicated and potentially lengthy to agree the vision to work towards.</p>

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Pollution, Contamination and Safety

Policy PCS/NV: Noise and Vibration

Background

9.451 The 2010 Noise Policy Statement for England sets out the following in relation to noise:

Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

9.452 The above is further reflected within the National Planning Policy Framework (NPPF) which sets out the following in relation to noise:

‘Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.’

9.453 Placemaking Plan Policy PCS2 highlights the planning system as having a role in seeking to ensure that new noise sensitive development such as housing and schools is not located close to existing sources of noise, including industrial uses and noise generated by vehicles and other forms of transport that would lead to nuisance. Also, it should ensure that potentially noise creating uses such as some industrial processes or some recreational activities are not located where they would be likely to cause nuisance.

9.454 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper.

Policy Approach

9.455 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement.

9.456 It is proposed to amend the policy to better reflect the aims as set out within the NPPF and the 2010 Noise Policy Statement for England. Particularly, the aim of seeking to improve health and quality of life, which can be used to protect quiet areas.

PCS/NV: Noise and Vibration	Option	Advantages	Disadvantages
A	Retain policy PCS2 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Minor amendment will improve clarity.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy PCS/AQ: Air Quality

Background

9.457 The National Planning Policy Framework (NPPF) sets out the following in relation to air quality:

‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’

9.458 Placemaking Plan Policy PCS3 seeks to ensure that the effects of a development on the local air quality are properly considered. Local policy, latest Government regulations and guidelines are used to determine the suitability of any proposal as it relates to local air quality.

9.459 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper.

Policy Approach

9.460 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement and strengthening the approach with regards to air quality.

PCS/AQ: Air Quality	Option	Advantages	Disadvantages
A	Retain policy PCS3 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Minor amendments improve clarity.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy PCS/BHS: Bath Hot Springs

Background

- 9.461 The Hot Springs are one of the six key attributes of the City of Bath World Heritage Site. Since Roman times with the development of 'Aquae Sulis' as a retreat for health therapy, worship and relaxation, Bath's Hot Springs have been the centre of social, economic and cultural developments in Bath. Settlement grew up around this resource which has culminated in the modern City of Bath. The Springs now attract many visitors annually with the opening of the Thermae Bath Spa.
- 9.462 There are three Hot Springs in the centre of Bath: the Kings Springs within the Roman Bath complex, the Cross Bath Spring, and the Hetling Spring in Hot Bath Street. Together they produce around 1.3 million litres of mineral-rich thermal water per day with a temperature of between 41 and 46°C. These thermal waters arise from the Carboniferous Limestone via fissures in the overlying layers (a layer of alluvium, successive layers of Lias Clay and limestone and Triassic Mercia mudstone) and appear as springs on the surface.
- 9.463 As the Bath Hot Springs are inextricably linked with the World Heritage Site, Core Strategy Policy B4 applies to their general protection. Policy PCS8 seeks to ensure that both the quality and quantity of the groundwater source is protected from development that is likely to have any adverse effect on this resource. It is also important to have this policy in place should the Council receive any planning applications for energy mineral exploration and extraction which may impact on Hot Springs and their sources (see Policy M5).
- 9.464 The current policy accords with national and local strategies, however, amendments could be incorporated to reference the second UNESCO World Heritage Site inscription as one of the 11 Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing. Inscribed on the World Heritage List on the 24th July 2021.
- 9.465 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper.

Policy Approach

9.466 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to take account of the second UNESCO World Heritage Site inscription.

PCS/BHS: Bath Hot Springs	Option	Advantages	Disadvantages
A	Retain policy PCS8 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Proposed amendments seek an update in respect of the World Heritage Site inscription.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Minerals and Waste

Minerals

Policy MIN/M: Strategic Approach to Minerals (Existing CP8A)

Background

- 9.467 The NPPF places importance on facilitating the sustainable use of minerals and asks local authorities to include policies relating to the extraction, prior extraction of minerals and for reclamation and restoration, to set out environmental criteria, and to define Minerals Safeguarding Areas.
- 9.468 Limestone is the principal commercial mineral worked in the District. There are currently two active sites – one surface working and one underground mine. Upper Lawn Quarry at Combe Down in Bath and Stoke Hill mine near Limpley Stoke both produce high quality Bath Stone building for renovation projects.
- 9.469 Bath & North East Somerset also has a legacy of coal mining and there are still coal resources within the area. Although no longer worked, there are potential public safety and land stability issues associated with these areas. These areas are currently safeguarded and the current Local Plan shows the general extent of the surface coal Mineral Safeguarding Area within the District. The Coal Authority has since advised in its guidance to Local Planning Authorities (LPAs) – Jan 2023 that it no longer requires the safeguarding of surface coal resource.
- 9.470 Historically Bath & North East Somerset has never made any significant contribution to regional aggregates supply and because of the scale and nature of the mineral operations in the District and the geology of the area it is considered that this situation will continue. Bristol is also in no position to make a contribution to regional aggregates supply, other than the provision of wharf facilities. However, North Somerset and South Gloucestershire have extensive permitted reserves of aggregates and have historically always met the sub regional apportionment for the West of England.
- 9.471 Current Local Plan Policy CP8a sets out the strategic approach to minerals for Bath & North East Somerset and seeks to ensure that mineral resources continue to be safeguarded. It also requires that potential ground instability issues, including those associated with the historical mining legacy, and the need for related remedial measures should be addressed as part of any proposal. The policy covers the strategic approach to extraction of minerals, environmental impact, and restoration.
- 9.472 A review of the policies and Mineral allocations and Safeguarding Areas has been undertaken by Atkins for the Council.

Policy Approach

9.473 Minor changes are proposed to the policy as follows:

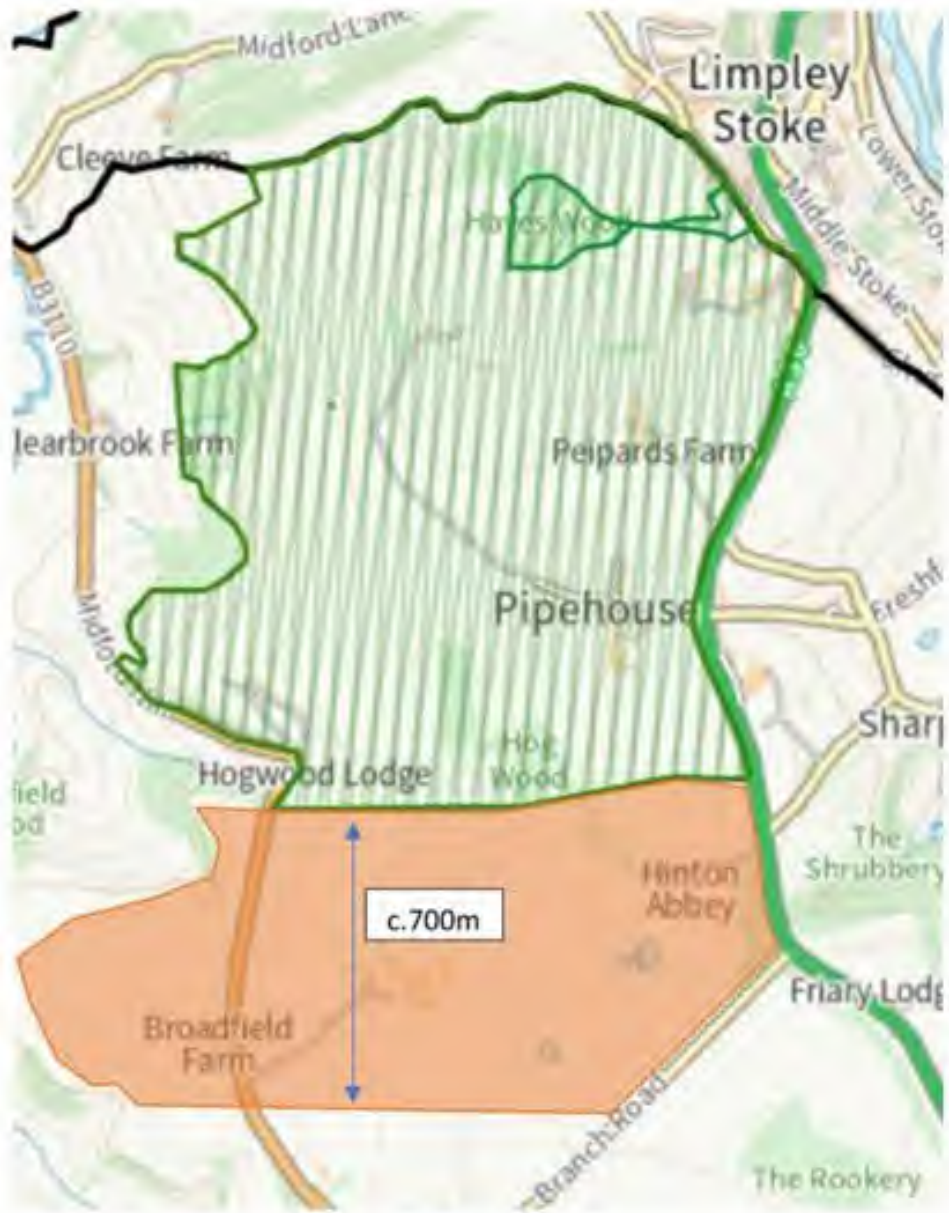
MIN/M: Strategic Approach to Minerals	Option	Advantages	Disadvantages
A	<p>Retain policy CP8A with amendments</p> <p>Add reference to note that secondary and recycled aggregate facilities will be supported, subject to satisfying relevant policy requirements.</p> <p>Add reference to requiring progressive and effective restoration of mineral sites and have regard to recognition of cumulative environmental impacts, in relation to reclamation and restoration.</p>	<p>The research highlights that development proposals which increase the supply of secondary and/or recycled aggregates will be supported, and that secondary and recycled facilities should be prioritised.</p> <p>Progressive restoration is favourable to limit environmental impacts and re-create priority habitats at the earliest opportunity at the same time as addressing the impacts of climate change.</p> <p>The cumulative impacts of minerals development should be addressed as part of the reclamation and restoration process</p>	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

Policy MIN/MSA: Mineral Safeguarding Areas (Existing M1)

Background

- 9.474 Mineral Safeguarding Areas are defined around the active mineral sites in the Plan area. The purpose of these areas is to avoid the needless sterilisation of mineral resources by non-mineral development. There is no presumption that any of these areas will be acceptable for mineral working and nor should they be used to automatically preclude other forms of development. Instead, they are to make sure that mineral resources are adequately and effectively considered in land use planning decisions.
- 9.475 The general extent of the Mineral Safeguarding Areas within the District are shown on the Policies Map. The existing Policy M1 clarifies how applications for non-mineral development within Mineral Safeguarding Areas will be considered.
- 9.476 Currently there are four key Mineral Safeguarding Areas (MSAs) – the MSAs around Upper Lawn quarry; and Stokes Hill mine - Hayes Wood to Hog Wood MSA, the Coal reserves MSAs between Keynsham and Radstock and an MSA to the east of Bishop Sutton, surrounding the former Stowey Quarry. Only the Upper Lawn quarry and Stokes Hill mine are active sites. As above, the Coal Authority no longer requires the safeguarding of coal resources and it is proposed that this should be deleted from the Policies Map in the Draft Local Plan. In relation to the East of Bishop Sutton MSA, it is recommended that this is retained, and development is not permitted that would sterilise the reserves, in case there is future interest in working in this area.
- 9.477 In updating evidence on MSAs, the mineral industry has been consulted. The operators of Stoke Hill Mine, near Limpley Stoke, have requested that the MSA surrounding the active Stoke Hill Mine is extended southwards and westwards to take into account that the reserves of Chalfield Oolitic limestone extend much further south than the current MSA. Figure 72 below shows the proposed extension to the Mineral Safeguarding Area extending approximately 700 metres southwards.



Key:

Existing Mineral Safeguarding Area:



Proposed extension:



Figure 72: Proposed extension to Mineral Safeguarding Area

Proposed Policy Approach

9.478 The current wording of existing Policy M1 remains relevant. It is proposed to retain the policy with amendments. Changes to the Policies map to reflect the extension of the MSA at Limpley Stoke to accord with the evidence of minerals, and deletion of the coal MSAs having regard to the Coal Authority advice are proposed.

MIN/MSA: Minerals Safeguarding Areas	Option	Advantages	Disadvantages
A	Retain policy with additional reference to provide clarity on what is covered in a Minerals Safeguarding Area; and to make clear that important minerals infrastructure should be protected and therefore safeguarded in the same way that minerals reserves are. In addition, the policy wording will clarify the evidence that developers will need to submit for proposed non-mineral related developments.	Adds clarity.	None identified.

MIN/MSA: Minerals Safeguarding Areas – Policies Map	Option	Advantages	Disadvantages
B	Propose extending the MSA south west of Limpley Stoke southwards and westwards.	Reflects the greater extent of the mineral reserve to be safeguarded.	None identified subject to the planning constraints and policy framework.
C	Propose deletion of coal Mineral Safeguarding Areas	This is in accordance with the Council's Climate Emergency declaration.	None identified.

Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options

Policy MIN/MA: Mineral Allocations (Existing M2)

Background

9.479 Active mineral working continues at both Upper Lawn Quarry and Stoke Hill Mine. However, Stowey Quarry, previously identified for future extraction, has now been worked to its maximum extent and the current planning permission for mineral extraction has expired.

9.480 The Upper Lawn Quarry has been extended since the Placemaking Plan was adopted under planning permission reference 16/05548/MINW. This covers a period of working up to 2035, therefore within the plan period. There have been no issues raised regarding the Preferred Area designation which covers a larger area than the permission site, within the MSA. Preferred Areas are defined in the NPPG as areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction.

- 9.481 The Stoke Hill mine is subject to a small allocation to cover the operational area above ground (as shown in the plan above of the MSA). The current site is subject to planning permission area 04/03910/MINW which was to “Extend the planning boundary to 70ha and the end date of the existing permission (ref: 96/02045/FUL) to 2042.”
- 9.482 The Stoke Hill Mine / Hayes Wood to Hog Wood MSA covers 175ha and aligns with an Area of Search. Areas of Search are defined as an area where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply. There remains therefore a substantial area identified for potential future working and this is considered likely to be adequate for the Local Plan period and should therefore be retained.

Proposed Policy Approach

- 9.483 It is proposed that the current policy text is retained.
- 9.484 The Upper Lawn Quarry allocation on the Policies Map is proposed to be amended to include the quarry extension area as approved and implemented. No changes are recommended to the Preferred Area designation.
- 9.485 No changes are proposed for the Stoke Hill mine allocation which covers the above ground operations of the permitted site. No changes are currently proposed for the Area of Search, which is significantly larger in extent than the permission site, which allows operations to 2042.

MIN/MA: Minerals Allocations – Policy Map	Option	Advantages	Disadvantages
A	Amend Upper Lawn Quarry allocation to take into account 2016 permission site area	To reflect the current workings and permitted site area.	None identified.
B	Retain Upper Lawn Quarry Preferred Area	No issues have been raised with the Preferred Area as designated.	None identified
C	Retain Stoke Hill Mine Allocation	No issues have been raised with the allocation.	None identified
D	Retain the Stoke Hill Mine Area of Search to align with the current Mineral Safeguarding Area	This allows for a potential expansion within the Area of Search should there be a potential shortfall in supply subject to planning.	This is an existing allocation. None identified.

Do you prefer Option A, Option B, Option C or Option D? Please explain the reasons for your opinion on these options

MIN/RF: Aggregate Recycling Facilities (Existing M3)

Background

9.486 Existing or approved aggregate recycling facilities in the Plan area are located at the former Fullers Earthworks site, Odd Down

9.487 Having regard to the often temporary nature of these facilities it is considered preferable for any future proposals that may come forward to be dealt with by a criteria based policy as set out below rather than by allocating specific sites/areas.

Proposed Policy Approach

9.488 Current Policy M3 establishes the policy approach to considering proposals for aggregate recycling facilities. It is proposed to retain the existing criteria-based approach with amendments to clarify that the development of aggregate recycling facilities will be supported, to increase aggregate reuse and recycling and to refer to specific additional siting considerations.

9.489 .The proposed approach is as follows:

MIN/RF: Aggregate Recycling Facilities	Option	Advantages	Disadvantages
A	Retain policy text with minor amendments to reflect a more pro-active approach and to specify additional siting considerations	This aligns with the NPPF priority for reuse and recycling of aggregates.	None identified.

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

MIN/WW: Winning and Working of Minerals (Existing M4)

Background

9.490 There is historically a low level of mineral activity within Bath and North East Somerset and this situation is unlikely to significantly change during the Plan period. A policy framework is therefore in place against which all minerals developments will be determined, and to ensure full consideration is given to minerals related planning applications.

Proposed Policy Approach

9.491 It is proposed to retain the existing policy, with minor amendments to clarify expectations from developers with regard to proposals.

9.492 The proposed approach is as follows:

MIN/WW: Winning and Working of Minerals	Option	Advantages	Disadvantages
A	Retain policy text with minor amendments to demonstrate a more prescriptive and ambitious approach that provides clarity on the expectations of B&NES in terms of applications made under this policy.	This provides greater certainty on what evidence developers are expected to submit with planning applications	None identified.

Please say why, and add any extra comments about this policy that you would like to make.

MIN/MD: Minerals development: environmental enhancement through restoration

Background

9.493 The NPPF states that planning policies should ensure that worked land is reclaimed at the earliest opportunity, and that high quality restoration and aftercare of mineral sites takes place (para 210 h). The Ecological Emergency Action Plan and Green Infrastructure Strategy together with requirements for Biodiversity Net Gain reinforce the need to address this issue.

Policy Approach

9.494 A new policy is proposed which aims to ensure that minerals developments is supported by reclamation and restoration proposals that prioritise environmental enhancement seeking positive improvements and a net gain in biodiversity. This will align with the adopted and proposed policy on Biodiversity Net Gain, the WECA Local Nature Recovery Network and Joint Green Infrastructure Strategy.

MIN/MD: Minerals development: environmental enhancement through restoration	Option	Advantages	Disadvantages
A	<p>New policy to ensure that minerals developments is supported by the phased restoration and aftercare of the site in order to ensure an appropriate and beneficial re-use, including recreational, leisure and other related uses that have a wider public benefit. Restoration proposals should improve the environment, with particular regard to the quality of soil, water, biodiversity and geodiversity, as well as flood risk, climate change, land stability and landscape character.</p>	<p>This policy reinforces the need for phased restoration of sites and environmental benefits and aligns with the Climate and Ecological Emergency, West of England Combined Authority Local Nature Recovery Network and Joint Green Infrastructure Strategy. It also ensures mineral sites are subject to the Biodiversity Net Gain policy framework.</p>	<p>None identified.</p>

Please say why, and add any extra comments about this policy that you would like to make.

MIN/HC: Conventional and Unconventional Hydrocarbons (Existing M5)

Background

- 9.495 Conventional hydrocarbons are oil and gas (energy minerals) where the reservoir is sandstone or limestone. Unconventional hydrocarbons refer to oil and gas which comes from sources such as shale or coal seams which act as the reservoirs.
- 9.496 The Government is responsible for issuing Petroleum Exploration and Development Licences (PEDLs) which give exclusive rights for exploration and extraction of oil and gas resources within a defined area. Gaining a licence does not convey consent to drill or undertake any other form of operations. All operations require other permissions as appropriate, such as Environment Agency permits, Health and Safety Executive (HSE) scrutiny, and Department for Energy Security and Net Zero (DESNZ) consent, together with planning permission.
- 9.497 Whilst there are currently no PEDLs within Bath & North East Somerset it is nonetheless important to have in place a robust planning policy framework for considering planning applications relating to conventional and unconventional hydrocarbons related development within Bath & North East Somerset should this situation change in the future. Planning permission would be required for all stages, including exploration, appraisal and production.
- 9.498 The particular concern for Bath & North East Somerset is the potential involvement of the deep drilling and fracturing or 'fracking' of deep geological resources in order to extract shale gas. This has implications for the Bath Hot Springs which rely on underground water resources from a wide geographical area and therefore there is a concern relating to the potential disruption that deep drilling and hydrofracturing (fracking) may cause.
- 9.499 The hot springs are very special to Bath and have always been, and continue to be, at the centre of economic, social and cultural developments in the City. As a Council, we are responsible for protecting and monitoring the springs. The Bath's World Heritage Site - Statement of Outstanding Universal Value - includes the Hot Springs.
- 9.500 The Council has also declared a Climate and Ecological Emergency, and the exploration, appraisal and processing of fossil fuels would be contrary to the priority to lead to carbon neutrality by 2030. It is also noted that the draft Overarching National Policy Statement for Energy, paragraph 3.4.7, suggests the need to move away from hydrocarbons as quickly as possible and the need to scale up the production of low carbon alternatives such as hydrogen and biofuels, but to manage the transition in a way that protects jobs and investment, uses existing infrastructure, maintains security of supply, and minimises environmental impacts.

9.501 Existing Policy M5 employs the precautionary principle in setting out a stringent framework within which development involving the exploration and/or appraisal of oil and gas resources will be considered.

Proposed Policy Approach

9.502 Having regard to the World Heritage Site status of Bath, the importance of the Hot Springs, and the Climate and Ecological Emergency, we propose to tighten the policy to indicate a presumption against development involving the exploration and/or appraisal of oil and gas resources in Bath and North East Somerset, whilst retaining a policy framework in the event that proposals come forward. The proposed approach is as follows:

MIN/HC: Conventional and Unconventional Hydrocarbons	Option	Advantages	Disadvantages
A	<p>Tighten up the policy to indicate a presumption against development involving the exploration and/or appraisal of oil and gas resources using in Bath and North East Somerset. Retain policy criteria for assessing proposals.</p> <p>Should alternative technologies and techniques emerge for the exploration and/or appraisal of oil and gas resources, developers would be required to provide compelling evidence of need for the proposed exploration/appraisal of oil and gas resources, having regard to the hierarchy of mineral sources; and demonstrate that there would be no unacceptable adverse effects on the environment, climate change, local communities and the transport network as a consequence of the proposed development</p>	<p>This will retain a policy framework in the event that a proposal is submitted. This would only be the case if a Petroleum Exploration and Development Licence (PEDL) were to be issued by the Government, and having regard to the other regulatory requirements.</p>	<p>This does not form an outright ban on “fracking”, which would align with the Council’s declared Climate Emergency. However, such a ban would be contrary to national policy and leave the Council with no local policy framework for determining any future proposals.</p>

Please say why, and add any extra comments about this policy that you would like to make.

Waste

The Joint Waste Core Strategy was prepared by the West of England authorities (Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire) and adopted in 2011. It sets out the strategic spatial planning policy for the provision of waste management infrastructure across the sub region plan area and is part of the statutory development plan for Bath and North East Somerset when considering development proposals for waste management. The Joint Waste Core Strategy also contains policies to direct the development of waste treatment facilities (that involving the recycling, composting, storage and transfer of wastes) and for the disposal of waste and includes site allocations for residual waste treatment facilities under Policy 5, subject also to development management policies.

One of the sites within the Joint Waste Core Strategy allocated for residual waste facilities within Bath and North East Somerset is at Broadmead Lane, Keynsham. This waste facility site allocation falls within an area that is being considered and has been identified in this Local Plan Options document as a proposed option for a major mixed-use development (that wouldn't include a waste facility) at North Keynsham (see chapter 6). Superseding this waste site allocation with a Local Plan allocation for mixed use development in the Draft Local Plan would potentially have implications for waste planning in the district and sub-region.

Notwithstanding this, there have been a number of changes since the Joint Waste Core Strategy was adopted in 2011. For example, the Waste Management Plan for England (2021) seeks to encourage a more sustainable and efficient approach to resource management and outlines the policies that are in place to help move towards a zero waste economy. The Environment Act 2021 and associated emerging regulations bring in statutory targets for residual waste, recycling and waste collections. Environment Act regulations coming into force in March 2025 require businesses to recycle food, glass, metal, plastic, paper and card. Whilst this is unlikely to increase the overall waste arisings this should increase the demand for recycling.

The proposed approach to waste planning will be investigated further in preparing the Draft Local Plan and in conjunction and co-operation with our neighbouring West of England authorities. This is particularly important given the cross boundary strategic nature of waste apportionment and treatment which is currently dealt with in the adopted West of England Joint Waste Core Strategy. As part of formulating waste policies for the new Local Plan, new waste technologies including opportunities to deliver small scale or micro waste management facilities on strategic development sites should be explored - these would have the potential to treat residual waste arisings from developments on-site.

I/I: Infrastructure Provision (existing CP13)

Background

- 9.503 The National Planning Policy Framework (NPPF) (2023) and associated Planning Practice Guidance (PPG) highlights the importance of the proper planning and delivery of infrastructure as part of the plan making process. The timely delivery of infrastructure required to support future development is also highlighted as one of the spatial priorities of the Local Plan.
- 9.504 The Council is working with and will continue to work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. The Council has prepared an Infrastructure Delivery Plan to accompany the adopted Local Plan, and this forms a baseline for future infrastructure needs which will arise from the emerging Local Plan policy requirements and site allocations set out in the Draft Local Plan (Regulation 19). The Infrastructure Delivery Plan will be updated alongside the Draft Local Plan to ensure infrastructure information remains up to date and is monitored effectively.
- 9.505 In preparing this Options document we have engaged with infrastructure providers including the water companies, energy companies, NHS and internal services such as schools to understand the implications of growth and to identify how any infrastructure capacity constraints might have implications for the Local Plan spatial strategy.
- 9.506 The details of the infrastructure needed for new developments and that which is needed to reduce deficiencies in existing infrastructure will be highlighted in the relevant sections of the place chapters of the Local Plan. There will also be a general District-wide policy that makes sure that all new developments are supported by the necessary infrastructure. This will be additional to specific policies requiring for example green infrastructure, active travel requirements, and policy requirements for allocations which set out the infrastructure required to support development.
- 9.507 A Viability Assessment will be undertaken to assess the viability of all policy requirements such as affordable housing, green infrastructure and transport measures in order to inform the Draft Local Plan (Regulation 19).
- 9.508 The existing Planning Obligations Supplementary Planning Document (SPD) which aligns with the current Local Plan will need to be updated to reflect the updated infrastructure requirements within the new Local Plan – policies and site allocations and the associated developer contributions. This is particularly important in the case of affordable housing which includes detailed requirements within the SPD.

9.509 An important issue that has arisen in the implementation of the adopted policy CP13 is the timing of infrastructure. It is important to ensure that infrastructure is delivered at the earliest opportunity to be in place for when developments are occupied. Notwithstanding this, the timing of delivery infrastructure in the programming of developments is a key issue for developers in terms of financing and viability.

Proposed Policy Approach

9.510 We propose to retain a generic policy requiring that new developments must be supported by the delivery of the required infrastructure to provide balanced and more self-contained communities. It will ensure that infrastructure is delivered at the earliest opportunity and in a co-ordinated way prior to occupation of new development. The policy will refer to developer contributions and an updated Planning Obligations Supplementary Planning Document.

I/I: Infrastructure Provision	Option	Advantages	Disadvantages
A	Retain policy CP13 with minor amendment to reference the timely delivery of infrastructure to ensure that infrastructure is delivered at the earliest opportunity.	This will aim to ensure that infrastructure is in place before occupation.	Viability may be an issue in terms of the cost of development finance for delivery of infrastructure at an early stage.

Please say why, and add any extra comments about this policy that you would like to make.

Appendix 1 – Policies retained from Local Plan Partial Update, Placemaking Plan and Core Strategy

The list below sets out the policies adopted in the Local Plan Partial Update, Placemaking Plan and Core Strategy, which are not proposed to be updated through preparation of the Local Plan.

Policies to be retained	Responding to Climate Change
LPPU	Policy CP1 Retrofitting Existing Buildings
LPPU	Policy CP4 District Heating
LPPU	Policy SCR9 Electric vehicles charging infrastructure
PMP	Policy SCR2 Roof Mounted/Building Integrated Scale Solar PV
PMP	Policy SCR5 Water Efficiency
PMP	Policy SU1 Sustainable Drainage
CS	Policy CP5 Flood Risk Management
High Quality Design	
LPPU	Policy D5 Building Design
LPPU	Policy D8 Lighting
PMP	Policy D1 General Urban Design Principles
PMP	Policy D2 Local Character & Distinctiveness
PMP	Policy D3 Urban Fabric
PMP	Policy D4 Streets and Spaces
PMP	Policy D6 Amenity

PMP	Policy D7 Infill & Backland Development
PMP	Policy D9 Advertisements & Outdoor Street Furniture
PMP	Policy D10 Public Realm
	Landscape
PMP	Policy NE2B Extension of residential curtilages in the countryside
	Green Belt
LPPU	Policy GB3 Extensions and alterations buildings in the Green Belt
PMP	Policy GB1 Visual amenities of the Green Belt
CS	Policy CP8 Green Belt
	Pollution, Contamination and Safety
LPPU	Policy PCS5 Contamination
PMP	Policy PCS1 Pollution and nuisance
PMP	Policy PCS4 Hazardous substances
PMP	Policy PCS6 Unstable land
PMP	Policy PCS7 Water Source Protection Zones
PMP	Policy PCS7A Foul sewage infrastructure
	Meeting Housing Needs

LPPU	Policy H2 Houses in Multiple Occupation
LPPU	Policy H3 Residential Use in Existing Buildings
LPPU	Policy H5 Retention of Existing Housing Stock
	Meeting Local Community and Recreational Needs
PMP	Policy LCR1 Safeguarding local community facilities
PMP	Policy LCR1A Public houses
PMP	Policy LCR5 Safeguarding existing sport and recreational facilities
PMP	Policy LCR7 Recreational development proposals affecting waterways
PMP	Policy LCR7A Telecommunications development
PMP	Policy LCR7C Commercial riding establishments
PMP	Policy LCR9 Increasing the Provision of Local Food Growing
	Economy
LPPU	Policy RE1 Employment uses in the countryside
PMP	Policy ED1A Office Development
PMP	Policy RE2 Agricultural development
PMP	Policy RE3 Farm diversification
PMP	Policy RE4 Essential dwellings for rural workers

PMP	Policy RE5 Agricultural land
PMP	Policy RE6 Re-use of rural buildings
PMP	Policy RE7 Visitor accommodation
	Centres and Retailing
LPPU	Policy CR1 Sequential Test
LPPU	Policy CR2 Impact Assessments
	Sustainable Transport
PMP	Policy ST4 Rail freight facility
	Bath
LPPU	Policy SB14 Twerton Park
LPPU	Policy SB24 Sion Hill
LPPU	Policy SB25 St Martin's Hospital
LPPU	Policy SB26 Park and Ride Sites
PMP	Policy SB9 The Bath Press
PMP	Policy SB15 Hartwells Garage
PMP	Policy SB16 Burlington Street
PMP	Policy SB17 Englishcombe Lane

CS	Policy B3A: Land adjoining Odd Down, Bath Strategic Site Allocation
	Keynsham
LPPU	Policy KE2B: Riverside and Fire Station Site
LPPU	Policy KE3C: East of Keynsham – Former Safeguarded Land
LPPU	Policy KE3D: East of Keynsham – Former Safeguarded Land
LPPU	Policy KE5: Treetops
PMP	Policy KE2A: Somerdale
PMP	Policy KE3A: Land Adjoining East Keynsham Strategic Site Allocation
	Somer Valley
LPPU	POLICY SSV4: Former Welton Manufacturing Site
LPPU	POLICY SSV21: Silver Street
LPPU	POLICY SSV9: Old Mills Industrial Estate (Incorporating Somer Valley Enterprise Zone)
LPPU	POLICY SSV22: Former Paulton Printworks
PMP	POLICY SV2 Midsomer Norton Town Centre Strategic Policy
PMP	POLICY SSV1: Central High Street Core Site
PMP	POLICY SSV3: Midsomer Norton Town Park

PMP	POLICY SSV17: Former Radstock County Infants
PMP	POLICY SSV20: Former St Nicholas School
PMP	POLICY SSV18: Somer Valley Campus
PMP	POLICY SSV11: St Peter's Factory Site
CS	POLICY SV3: Radstock Town Centre Strategic Policy
	Rural Areas
PMP	SR5 – Pinkers Farm
PMP	SR14 – Wheelers Manufacturing Block Works
PMP	SR15 – Land to the East of the St Mary's School Context

Do you agree that these policies should be retained?

Appendix 2

Proposed Safeguarded Strategic and Locally Significant Industrial Sites

Bath

- Newbridge Riverside (Brassmill Lane, Locksbrook Road Estate and The Maltings) excluding Locksbrook Creativity Hub and the Fashion Collection Archive.
- Victoria Park Business Centre, Kelso Place, Lower Weston, Bath
- Stable Yard, Windsor Bridge Road, Twerton, Bath
- Railway Arches, Wood Street, Lower Bristol Road, Bath
- Polamco, Western Lock, Lower Bristol Road, Bath
- Pinesway Industrial Estate, Ivo Peters Road, Bath
- Commercial space, Cheltenham Street, Bath
- Bath Self Storage, Bellotts Road, Twerton, Bath
- M & B Engineering, Bellotts Road, Twerton, Bath
- Booker Mcconnell Plc, Bellotts Road, Twerton, Bath
- Workman's Yard, Claude Avenue, Twerton, Bath
- Commercial space, Lymore Gardens, Twerton, Bath,
- Commercial buildings to the north of Dartmouth Avenue, Twerton, Bath
- Bath Trade Park, Westmoreland Station Road, Westmoreland, Bath
- Broadway Court, Miles Street, Widcombe, Bath
- Ferry Court, Ferry Lane, Bathwick, Bath
- Cross Manufacturing, Midford Road, Odd Down, Bath

Keynsham

- Broadmead Lane, Ashmead Road & Unity Road Estate, including World's End Lane Extension
- Pixash Lane
- Wansdyke Workshops, Unity Road, Keynsham

Somer Valley

- Bath Business Park, Peasedown St John
- Old Mills Industrial Estate, Paulton
- Midsomer Enterprise Park, Radstock
- Mill Road, Radstock
- Haydon Industrial Estate, Radstock
- Westfield Industrial Estate
- Coombend, Radstock
- Former Sewage Works, Welton Hollow and Land West of Midsomer Enterprise Park

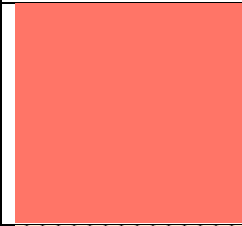
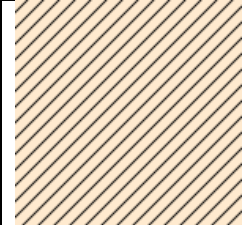
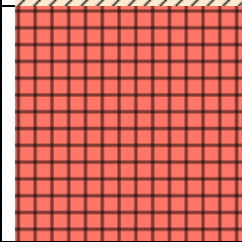
Rural Area

- Cloud Hill Industrial Estate/Trident Works, Temple Cloud
- Temple Bridge Business Park, Temple Cloud
- Hallatrow Business Park, Wells Road, Hallatrow
- Farrington Fields Trading Estate, Farrington Gurney
- Church Farm Business Park, Ashton Hill, Corston
- Burnett Business Park, Gypsy Lane, Keynsham
- Timsbury Village Workshops, Hayeswood Road, Timsbury

Appendix 3: Proposed Changes to District and Local Centre Designations

Map Details

- Plans are diagrammatic only and are not to scale
- In all cases plan extracts are shown so that north is at the top of the box.

Key:	
	Current District / Local Centre designation
	Proposed Addition of Local Centre designation
	Proposed deletion of District /Local Centre designation

Appendix 3 Contents

District Centres

- [Moorland Road, Bath](#)

Local Centres In Bath

- [Camden Road & Fairfield Road](#)
- [Chelsea Road Local Centre \(extract\)](#)
- [The Avenue, Combe Down Local Centre](#)
- [The Avenue, Combe Down Local Centre \(separated units\)](#)
- [Larkhall Local Centre](#)
- [Margaret's Buildings Local Centre](#)
- [Nelson Place East & Cleveland Place Local Centre](#)
- [Odd Down \(Frome Road Local Centre and Upper Bloomfield Road Local Centre\)](#)
- [Odd Down - Upper Bloomfield Road Local Centre \(extract\)](#)
- [Twerton High Street Local Centre](#)
- [Walcot Street Local Centre \(extract\)](#)
- [Weston High Street Local Centre](#)
- [Widcombe Parade Local Centre](#)

Keynsham/ Salford area

- [Queen's Road Local Centre](#)
- [Salford Local Centre](#)


Somer Valley

- [Paulton Local Centre](#)
- [Peasedown St John Local Centre \(extract\)](#)


Rest of District

- [Batheaston Local Centre](#)
- [Chew Magna Local Centre](#)
- [Whitchurch Local Centre](#)

Review of District Centre

Moorland Road District Centre	Proposed Change
	<p>Deletion of part of the old Co-op to reflect the redevelopment of the site for mixed uses which has been implemented. (application ref 21/04049/FUL)</p>



Review of Local Centres

Camden Road & Fairfield Road Local Centre	Proposed Addition of unit
	<p>Proposed addition of health centre. Health Centres are now a Class E (Commercial, Business and Service) use.</p>


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Chelsea Road Local Centre (extract)	Proposed Deletion of unit
	<p>Delete No 18 Newbridge Road, Bath BA1 3JY. Property was built as a semi detached dwelling and is peripheral with no visual linkage to the Chelsea Road Local Centre shopping area.</p>

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<p>The Avenue, Combe Down Local Centre</p>	<p>Proposed Addition of unit</p>
 <p>A map of the Avenue, Combe Down area. Several buildings are highlighted in red, indicating proposed additions. The map shows 'THE AVENUE' running vertically, 'Avenue Place' branching off to the left, and 'De Mowden' at the bottom. Other streets shown include 'Lynton', 'Thurleston', 'Gay Stairhe', 'Isabella Mews', 'Park Villa', and '79'. Building numbers 81 and 88 are also visible.</p>	<p>Add 3, Avenue Place, The Avenue, Combe Down, Bath, BA2 5EE</p> <p>This is a shop with a shopfront and is a Main Town Centre Use.</p>
<p>The Avenue, Combe Down Local Centre (separated units)</p>	<p>Proposed deletion of units</p>
 <p>A map of the Avenue, Combe Down area. A cluster of buildings is highlighted in red, indicating proposed deletions. The map shows 'Church Place' and 'BYFIELD PLACE' at the bottom. Other streets shown include 'Dyfield' and 'Dyfield'. Building numbers 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100 are visible.</p>	<p>Delete Hair salon at 64, Combe Road, Combe Down, Bath, BA2 5HZ, a residential unit at 66 Combe Road and a store at 68 Combe Road.</p> <p>Only the hair salon is a use attracting footfall. This unit is physically unrelated to the main focus of the local centre at the Avenue, Combe Down.</p>


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Larkhall Local Centre	Proposed Addition of units.
	<p>Add Leak, Larkhall Square, Larkhall (gift shop and public toilet) as Main Town Centre use</p> <p>Add Burger Steakhouse, St Saviour's Road, Lambridge, Bath, BA1 6RT as Main Town Centre use</p> <p>Add 1A and 2, Beaufort Place, Lambridge, Bath, BA1 6RP these are Main Town Centre uses Class E Uses with shopfronts.</p>


Margaret's Buildings Local Centre	Proposed deletion of unit
	<p>Delete 20, Catharine Place, Bath, BA1 2PR as a residential use.</p>


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<p>Nelson Place East & Cleveland Place Local Centre</p>	<p>Proposed addition of unit</p>
	<p>Add Piano Shop, 1 & 2 Canton Place, London Road, Walcot, Bath, BA1 6AA as a Main Town Centre Use</p>

<p>Odd Down (Frome Road Local Centre and Upper Bloomfield Road Local Centre)</p>	<p>Proposed addition of unit and merging of</p>
	<p>Merge “Frome Road Local Centre” and “Upper Bloomfield Road Local Centre”.</p> <p>Add Odd Down Co-op, Upper Bloomfield Road, Odd Down, Bath, BA2 2RY as Main Town Centre Use</p>

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Odd Down - Upper Bloomfield Road Local Centre	Proposed Deletion of Unit
	<p>Delete 47 Upper Bloomfield Road as this is residential, built as residential.</p>

Twerton High Street Local Centre	
	<p>Delete 82 High Street, Twerton – this is residential.</p>

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Walcot Street Local Centre (extract)



Add the The Bell Inn, 103 Walcot St, Bath BA1 5BW as Main Town Centre Use

Add Bath Aqua Glass Glassblowing Studio, Walcot Street Bath BA1 5BW
This is a Class E use.

Weston High Street Local Centre




Add 128A High Street, Upper Weston, Bath BA1 4DF.


This is a café –Main Town Centre Use.

Add Maison Nesta Hair Stylist, 22A, High Street, Upper Weston, Bath, BA1 4B as this is a Main Town Centre Use.

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Widcombe Local Centre	Proposed Additions
 <p>The map shows a street layout in Widcombe, Bath. Buildings along Widcombe Parade and Widcombe Wharf are highlighted in red. A large area on the right side of the map is hatched with diagonal lines. Other buildings are shown in light orange and yellow.</p>	<p>Add Main town centre uses as follows:</p> <p>Co-op, Widcombe Wharf, Widcombe Hill, Bath, BA2 6AA</p> <p>White Hart Inn, Widcombe, Bath, BA2 6AA</p> <p>Widcombe Pharmacy, 4A, Widcombe Parade, Bath, BA2 4JT</p> <p>Offices, 1-2, Widcombe Parade, Widcombe, Bath, BA2 4JT</p> <p>Class E use: Widcombe Surgery 3-4, Widcombe Parade, Bath, BA2 4JT</p>

Keynsham and Salford Area

Keynsham – Queen’s Road Local Centre	
 <p>The map shows a street layout in Keynsham, Bristol. Buildings along Queens Road and Tenby Road are highlighted in red. A large area on the right side of the map is hatched with diagonal lines. Other buildings are shown in light orange and yellow.</p>	<p>Add Co-op, 61, Queens Road, Keynsham, Bristol, BS31 2NW as this is a Main Town Centre Use directly adjacent to the existing Local Centre.</p>

Saltford Local Centre



Add The Little Coffee Shop, Manor Road, Saltford, Bath, BS31 3DL as Main Town Centre Use linked to the local centre.

Somer Valley

Paulton Local Centre



Add Red Lion, High Street, Paulton, Bristol, BS39 7NW as Main Town Centre Use within the centre.

Delete residential properties, High Street Paulton.

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Peasedown St John Local Centre (extract)



Add Tesco Express, Bath Road, Peasedown St John, Bath, BA2 8DN as Main Town Centre Use

Delete 9, Bath Road, Peasedown St John, Bath, BA2 8DX

A former butcher changed use to residential.

Delete 64-65, Bath Road, Peasedown St John, Bath, BA2 8DT

2 dwellings built as semi detached houses.


Rest of District


Batheaston Local Centre



Proposed addition of health centre. Health Centres are now a Class E (Commercial, Business and Service) use.

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Chew Magna Local Centre	
	<p>Add Extension to The Pelican Inn 10, South Parade, Chew Magna, Bristol, BS40 8SL as Main Town Centre Use within the centre</p>

Whitchurch Local Centre	
	<p>Delete 85A, Bristol Road, Whitchurch, Bristol, BS14 0PS as site redeveloped for residential.</p> <p>Add Toby Carvery, 42, Bristol Road, Whitchurch, Bristol, BS14 0PT as Main Town Centre use within the centre.</p>

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Appendix 4: Proposed Local Green Spaces

- Plans diagrammatic only. Not to scale.
- In all cases plan extracts are shown so that north is at the top of the box

Key:	
	Proposed Local Green Space (for designation in Local Plan 2022-2042)
	Existing Local Green Space (designated in the adopted Placemaking Plan)

Appendix 4 Contents

Bath

Lambridge

[Batstone Close](#)

[Fairfield Valley Woodland](#)

[Toll Bridge Road](#)

Lansdown

[Catherine Place Garden](#)

[Cavendish Crescent Communal Garden](#)

[Lansdown Heights](#)

[Solsbury Way Green Spaces](#)

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Wider District

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East Harptree

[East Harptree Playing Field](#)

Hinton Blewett

[The Barbury](#)

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Radstock

[Green Parcel of land off Frome Road](#)

Shoscombe

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Whitchurch


[White Church Court Play Area](#)


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[Bristol 107th Scout Hut & surrounding Green Space](#)

Lambridge

Ward:	Lambridge
Site name:	Batstone Close Green Space
Site number:	LGSB5
Map:	 A detailed street map of the Lambridge area. A specific green space, Batstone Close Green Space, is highlighted in a light green color and outlined with a red dashed border. The map shows surrounding residential streets and buildings.

Ward:	Lambridge
Site name:	Fairfield Valley Woodland
Site number:	LGSB6
Map:	 A detailed street map of the Lambridge area. A specific woodland area, Fairfield Valley Woodland, is highlighted in a light green color and outlined with a red dashed border. The map shows surrounding residential streets and buildings.


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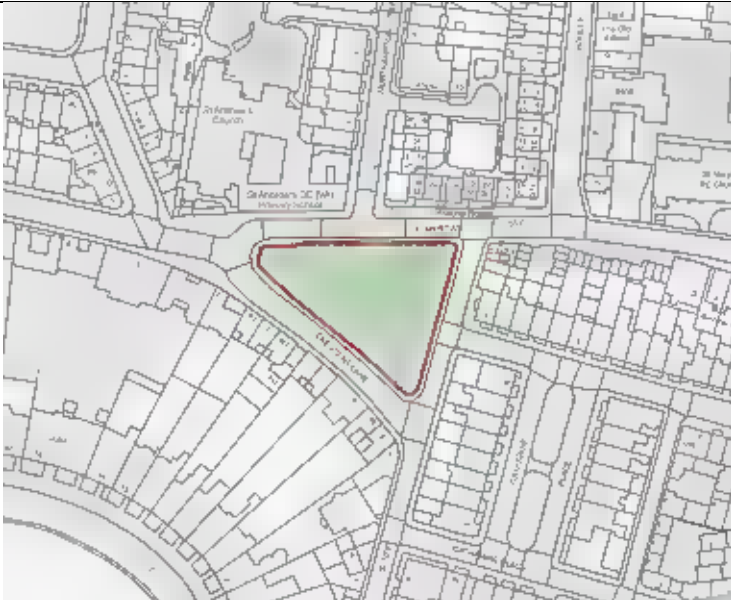
Ward:	Lambridge
Site name:	Toll Bridge Road

Ward:	Lansdown
Site name:	Cavendish Crescent Communal Garden
Site number:	LGSB14
Map:	

Ward:	Lansdown
Site name:	Lansdown Heights
Site number:	LGSB15
Map:	


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Ward:	Lansdown
Site name:	Solsbury Way Green Spaces
Site number:	LGSB16
Map:	 A detailed street map of the Lansdown area. A series of green rectangular areas are highlighted along Solsbury Way, indicating the locations of green spaces. The map shows surrounding residential streets and building footprints.


Ward:	Lansdown
Site name:	St Andrew's Green
Site number:	LGSB17
Map:	 A detailed street map of the Lansdown area. A triangular green area is highlighted, representing St Andrew's Green. The map shows the surrounding streets, including St Andrew's Church and St Andrew's C of E, and other residential buildings.

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Newbridge


Ward:	Newbridge
Site name:	Newbridge Open Space (Newbridge Park)
Site number:	LGSB23
Map:	 A detailed street map of the Newbridge area. A large, irregularly shaped area in the center is highlighted in green and outlined in red. This area is labeled 'NEWBRIDGE' and 'NEWBRIDGE OPEN SPACE'. The surrounding area shows residential streets and buildings.

Walcot


Ward:	Walcot
Site name:	Kensington Gardens
Site number:	LGSB26
Map:	 A detailed street map of the Walcot area. A rectangular area in the center is highlighted in blue with a dotted pattern and outlined in red. This area is labeled 'KENSINGTON GARDENS'. The surrounding area shows residential streets and buildings, including 'KENSINGTON GARDENS' and 'UPPER GAST AVENUE'.

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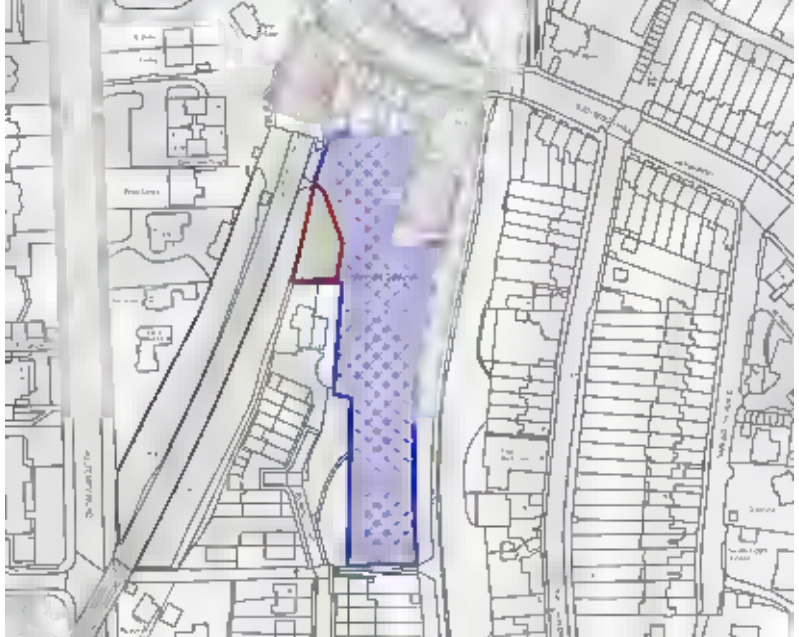
Weston


Ward:	Weston
Site name:	Gainsborough Gardens Woods
Site number:	LGSB27
Map:	 A detailed street map of the Weston area. A specific area, identified as Gainsborough Gardens Woods, is highlighted in a light green color. The map shows a grid of streets and building footprints. The highlighted area is a narrow, elongated green space situated between several streets.

Widcombe and Lyncombe

Ward:	Widcombe and Lyncombe
Site name:	Abbey View Allotments
Site number:	LGSB31
Map:	 A detailed street map of the Widcombe and Lyncombe area. A large area, identified as Abbey View Allotments, is highlighted in a light purple color. The map shows a grid of streets and building footprints. The highlighted area is a large, irregularly shaped purple space situated between several streets. A smaller area is highlighted in green at the bottom left of the purple area.


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Ward:	Widcombe and Lyncombe
Site name:	Canal Gardens Allotments
Site number:	LGSB32
Map:	 A detailed street map of the Canal Gardens area in Widcombe and Lyncombe. A rectangular area, outlined in red and filled with a blue grid pattern, represents the allotments. The map shows surrounding streets, buildings, and a canal.

Ward:	Widcombe and Lyncombe
Site name:	The Gore
Site number:	LGSB33
Map:	 A detailed street map of the Gore area in Widcombe and Lyncombe. A small, irregularly shaped area, outlined in red and filled with a light green color, represents 'The Gore'. The map shows surrounding streets, buildings, and a canal.

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Chew Stoke

Parish:	Chew Stoke
Site name:	Bilbie Road Play Park
Site number:	LGSR3
Map:	 <p>A detailed map of Chew Stoke showing various buildings and streets. A specific area, labeled 'Play Area' and 'Play Site', is highlighted in green and outlined in red. This area is situated near a river and a 'New Bridge'. Other labeled locations include 'Mayfield', 'Oxford House', 'Willowbank', 'Blunstone', 'Edenbrook', and 'Town'. The map also shows 'Cairn Cottage', 'Eyn Tinn House', and 'Springfield Cottage'.</p>


Parish:	Chew Stoke
Site name:	Rectory Field
Site number:	LGSR4
Map:	 <p>A detailed map of Chew Stoke showing a large area labeled 'Rectory Farm' highlighted in green and outlined in red. This area is located near a church and a 'Hall'. The map also shows 'Rectory Farm' and 'Hall' labels. Other nearby features include 'Church' and 'Wain'.</p>

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Monkton Combe


Parish:	Monkton Combe
Site name:	The Island – Mill Lane
Site number:	LGSR15
Map:	

Radstock


Parish:	Radstock
Site name:	Green Parcel of land off Frome Road
Site number:	LGSR19
Map:	

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Shoscombe

Parish:	Shoscombe
Site name:	Shoscombe Recreation Field
Site number:	LGSR23
Map:	 A topographic map showing the Shoscombe Recreation Field. The field is a green-shaded area outlined in red, located south of White Hill. Other features include 'Lower Shoscombe Farm' to the west, 'White Hill' with a 125m elevation, and 'Recreation Ground' and 'Hall' within the field. A path and a road are also visible.

Stanton Drew

Parish:	Stanton Drew
Site name:	Stanton Wick Triangle
Site number:	LGSR27
Map:	 A topographic map showing the Stanton Wick Triangle. The triangle is a red-shaded area outlined in red, located near 'Orange Tree Cottage' and 'Glass House Cottage'. Other features include 'Gate', 'LB', and 'TCB'.

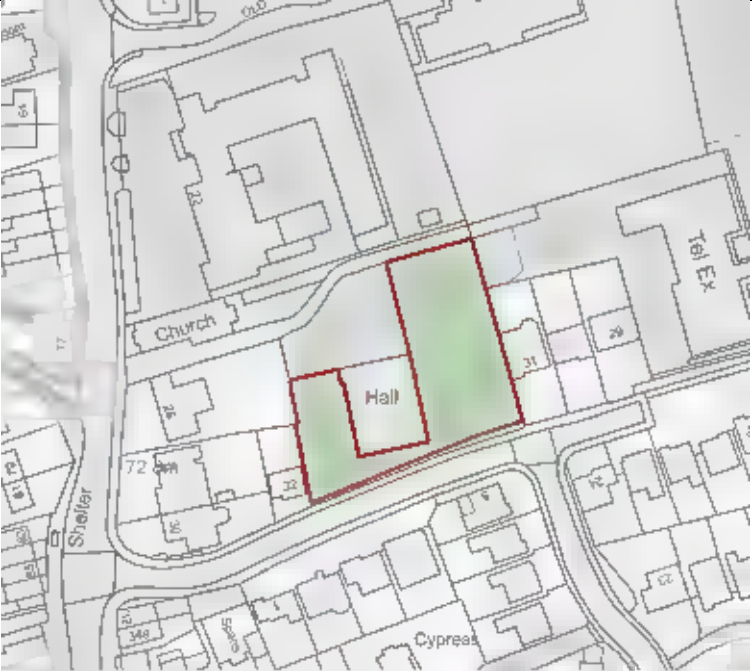
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Whitchurch

Parish:	Whitchurch
Site name:	White Church Court Play Area
Site number:	LGSR29
Map:	 <p>A detailed map showing a residential area in Whitchurch. A green-shaded area labeled 'Play Area' is outlined in red. The map includes labels for 'Cranford House' to the west, 'WANSDYKE WAY' at the bottom, and 'MAES KNOLL DRIVE' to the east. Various house numbers and street names are visible throughout the residential blocks.</p>

Parish:	Whitchurch
Site name:	White Church Court Allotment Site
Site number:	LGSR30
Map:	 <p>A detailed map showing a residential area in Whitchurch, identical to the one above. A red-shaded area, representing the allotment site, is outlined in red. The map includes labels for 'Cranford House' to the west, 'WANSDYKE WAY' at the bottom, and 'MAES KNOLL DRIVE' to the east. Various house numbers and street names are visible throughout the residential blocks.</p>

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Parish:	Whitchurch
Site name:	Green Space surrounding Whitchurch Village Community Centre
Site number:	LGSR31
Map:	 <p>The map shows a residential area with several streets including Church, Shelter, and Cypress. A green rectangular area is highlighted, labeled 'Hall'. Other buildings are labeled with numbers like 72, 31, 2, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100.</p>

Parish:	Whitchurch
Site name:	Bristol 107 th Scout Hut & surrounding Green Space
Site number:	LGSR32
Map:	 <p>The map shows a residential area with streets including HAGGER LANE and CHURCHWAY'S. A green rectangular area is highlighted, labeled 'Club'. A distance of 65.5m is marked. Other buildings are labeled with numbers like 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100.</p>

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Appendix 5: Glossary

- Please see [link here](#).